

Newcastle-under-Lyme Local Plan

Sustainability Appraisal Scoping Report

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Introduction

A Sustainability Appraisal Scoping Report has been prepared to support the Borough Local Plan. This Introductory section explains what the Scoping Report is and sets out the regulatory requirements and elements of the National Planning Practice Guidance which relate to Sustainability Appraisals.

The Scoping Report needs to identify the scope and level of detail of the information to be included in the sustainability appraisal report which will accompany the Local Plan. It is comprised of 2 main elements: a considered overview of other relevant plans and policies that relate to sustainability, and a baseline assessment of the characteristics of the Borough. Both of these highlight issues regarding sustainability which are used to formulate sustainability objectives. The final section of this report recommends a set of Sustainability Criteria which will be used to promote sustainable policy choices from options presented in the Local Plan.

Requirement to undertake Sustainability appraisal and Strategic Environmental Assessment

Regulatory Requirements

Section 19 of the Planning and Compulsory Purchase Act 2004 states that it is a requirement for local planning authorities to carry out a SA for each proposal made in a Local Plan during its preparation.

The Planning Practice Guidance (PPG) highlights that "More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development."

Strategic Environmental Assessment (SEA) Directive

The Strategic Environmental Assessment (SEA) Directive is a document published in September 2005 which gives guidance on applying the European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'¹.

¹ https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance

The SEA Directive requires that the SA Scoping Report takes account of other relevant plans and programmes. This is to ensure that all objectives and considerations mentioned in these plans and programmes are taken in to account when producing a development plan document.

A full list of plans and programmes which are considered relevant are provided in the following section 'Other Plans and Programmes'.

National Planning Policy Framework (NPPF) and the definition of Sustainable Development

"The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locallyprepared plans for housing and other development can be produced"².

Paragraph 32 of the NPPF states that "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)".

The NPPF states that there are three overarching objectives to sustainable development which are interdependent and need to be pursued in mutually supportive ways. They are:

"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

² National Planning Policy Framework (2019) Paragraph 1

c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

The NPPF clearly states that local planning authorities must consider the economic, social and environmental objectives during the plan making process. Paragraph 15 of the NPPF states "Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings".

Planning Practice Guidance

National planning guidance on Sustainability Appraisal provides a more in depth overview of the process of SA. The Planning Practice Guidance states that "a sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives"³.

The guidance also states that "this process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the rests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the plan"⁴.

What is the difference between a Sustainability Assessment, a Strategic Environmental Assessment and an Environmental Impact Assessment?

"Strategic environmental assessments consider only the environmental effects of a plan, whereas sustainability appraisals consider the plan's wider economic and social effects in addition to its potential environmental impacts"⁵.

³ Planning Practice Guidance Paragraph: 001 Reference ID: 11-001-20190722

⁴ Planning Practice Guidance Paragraph: 001 Reference ID: 11-001-20190722

⁵ Planning Practice Guidance Paragraph: 007 Reference ID: 11-007-20140306

"Sustainability appraisals should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004"⁶. This therefore means that a separate strategic environmental assessment does not need to be produced alongside this sustainability appraisal. Further, Planning Practice Guidance states that an "Environmental Impact Assessment is applied to individual projects which are likely to have significant environmental effects"⁷.

Environmental Assessment of Plans and Programmes Regulations (2004)

The Environmental Assessment of Plans and Programmes Regulations was published in 2004 "to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development".

Preparation of an environmental report which effects the implementation of plans and programmes must take in to account:

- Outline of the plan or programme and relationship with other relevant plans and programmes;
- The current state of the environment and the potential change in the environment without the implementation of the plan or programme;
- The environmental characteristics of areas that are likely to be affected;
- Any existing environmental problems which are relevant to the plan or programme, including any relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
- The environmental objectives, established at international, national or local level which are relevant to the plan or programme and how they have been taken into account during its preparation;
- The likely effects on the environment, including primary, secondary, cumulative, short, medium and long-term, permanent, temporary, negative and positive impacts. These include effects on (and between):
 - o Biodiversity;
 - Population;
 - Human health;

⁶ Planning Practice Guidance Paragraph: 007 Reference ID: 11-007-20140306

⁷ Planning Practice Guidance Paragraph: 003 Reference ID: 11-003-20190722

- Fauna and flora;
- o Soil;
- o Water;
- o Air;
- Climatic factors;
- Material assets;
- Cultural heritage;
- Landscapes.
- The measures presumed to prevent, reduce and where possible fully offset any adverse effects on the environment caused by implementing the plan or programme;
- Reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information;
- The measures indicated for monitoring in accordance with Article 10 of the Environmental Assessment of Plans and Programmes Regulations 2004;
- A non-technical summary of the information provided under the above headings⁸.

When producing a SA for plans and programmes, local planning authorities need to show a clear understanding of the area the plan/programme is intended to cover. Further, they need to clearly identify any areas beyond the plan/programme boundary which may still be impacted.

This forms the 'Baseline' for the SA. The local planning authority also needs to show the potential impacts on the baseline data if no plan or programme were to be introduced.

The SA Scoping Report also needs to show how social, economic and environmental conditions in the plan boundary can be monitored, as well as how the plan/programme itself can be monitored.

Summary

This section has detailed the regulatory framework, definition of sustainability in national policy and why the Council is producing a Scoping Report. For further detailed guidance on the process of Sustainability Appraisal, please see national planning practice guidance [https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainabilityappraisal].

⁸ A practical guide to the Strategic Environmental Assessment Directive

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/76 57/practicalguidesea.pdf

Other Plans and Programmes

The regulations on undertaking a Sustainability Appraisal Scoping Report (SA) state that Local Planning Authorities must consider other plans and programmes when producing their report. This section provides an overview of international, national and local plans and programmes which Newcastle under Lyme Borough Council believe are relevant to the production of the SA.

There is no definitive list of plans and programmes which must be reviewed. Those listed below are deemed relevant by Newcastle under Lyme Council to the production of the Sustainability Appraisal Scoping Report. These lists will be kept under constant review during the production of the SA.

International

Table 1: International Plans and Programmes

Plan Name	Summary	Sustainability
		Theme
Paris Agreement (2016)	Adopted by 196 parties to limit global	Climate change
	warming to well below 2, preferably	mitigation
	1.5 degrees Celsius, compared to	
	pre-industrial levels.	
Aarhus Convention (1998)	Guarantees the access to	Transparency of
	information, public participation in	environmental
	decision making and access to	data
	justice in environmental matters.	
Air Quality Framework Directive	Amends several annexes to	Improve air
2015/1480/EC	Directives 2004/107/EC and	quality
	2008/50/EC of the European	
	Parliament and of the Council laying	
	down the rules concerning reference	
	methods, data validation and location	
	of sampling points for the	
	assessment of ambient air quality.	
The Convention for the	The main purpose of the Convention	Transparency of
Protection of the Architectural	is to reinforce and promote policies	environmental
Heritage of Europe (Granada	for the conservation and	data
Convention)	enhancement of Europe's heritage.	

Bern Convention on the	Aims to promote co-operation	Improve
Conservation of Migratory	between the signatory countries in	biodiversity
Species of Wild Animals (1979)	order to conserve wild flora and	
Bern Convention on	fauna and their natural habitats and	
Conservation of Natural	to protect endangered migratory	
Habitats and Wild Fauna and	species.	
Flora (92/43/EC, Habitats		
Directive) (1992)		
Convention on the Conservation	Aims to conserve wild flora and	Improve
of European Wildlife and	fauna and their natural habitats and	biodiversity
Natural Habitats (1979)	to promote European co-operation in	
	that field. It places an importance on	
	the need to protect endangered	
	natural habitats and vulnerable	
	species, including migratory species.	
The Convention on Wetlands of	The only international mechanism for	Transparency of
International Importance (The	protecting sites of global	environmental
Ramsar Convention) (1971)	importance and is thus of key	data
	conservation significance.	
EU Birds Directive	A legal framework, binding for all	Improve
(2009/147/EC)	Member States, for the protection of	biodiversity
	all wild birds in the EU, including their	
	eggs, nests and habitats.	
EU Sustainable Development	The overall aim was to identify and	Encourage
Strategy (2006)	develop actions to a continuous long-	sustainable
	term improvement of quality of life	waste
	through the creation of sustainable	management
	communities able to manage and	
	use resources efficiently, able to tap	
	the ecological and social innovation	
	potential of the economy and in the	
	end able to ensure prosperity,	
	environmental protection and social	
	cohesion.	
European Commission	A comprehensive, ambitious and	Improve
Biodiversity Strategy (2012)	long-term plan to protect nature and	biodiversity

	reverse the degradation of	
	reverse the degradation of	
	ecosystems. The strategy aims to	
	put Europe's biodiversity on a path to	
	recovery by 2030.	
The European Convention on	Sets guidelines for the funding of	Heritage/cultural
the Protection of Archaeological	excavation and research work and	conservation
Heritage (Valetta Convention)	publication of research findings. It	
	also deals with public access, in	
	particular to archaeological sites, and	
	educational actions to be undertaken	
	to develop public awareness of the	
	value of the archaeological heritage.	
European Landscape	Promotes the protection,	Strengthen the
Convention (2000)	management and planning of	quality of
	European landscapes and	landscapes
	organises European co-operation on	
	landscape issues.	
The Floods Directive	A framework for the assessment and	Development
(2007/60/EC)	management of flood risks to reduce	management in
	the negative consequences	flood risk areas
	of flooding on human health,	
	economic activities, the environment	
	and cultural heritage in the European	
	Union.	
Groundwater Daughter	Designed to prevent and combat	Improve water
Directive (2006/118/EC)	groundwater pollution in the	quality
	European Union.	
Habitat and Species Directive	Ensures the conservation of a wide	Improve
92/43/EEC (1992)	range of rare, threatened or endemic	biodiversity
	animal and plant species.	biodiversity
Kyoto Protocol (1997)	Commits industrialized countries and	Climate change
		-
	economies in transition to limit and	mitigation
	reduce greenhouse gases (GHG)	
	emissions in accordance with agreed	
	individual targets.	

Nitrates Directive (91/676/EEC)	Aims to protect water quality across	Improve water
	Europe by preventing nitrates from	quality
	agricultural sources polluting ground	
	and sur- face waters and by	
	promoting the use of good farming	
	practices.	
Water Framework Directive	An EU directive which commits	Improve water
(2000/60/EC)	European Union member states to	quality
	achieve good qualitative and	
	quantitative status of all water bodies	
	by 2015.	
(Wild) Bird Directive	Member states must ensure that	Improve
79/409/EEC (1979)	all bird species have a sufficient	biodiversity
	diversity of habitats to maintain their	
	populations. The Directive provides	
	provision for the re-establishment of	
	damaged habitats, creation of	
	protected areas and re-	
	establishment or creation of	
	biotopes.	
World Heritage Convention	The primary mission of the	Transparency of
(1972)	Convention is to identify and protect	environmental
	the world's natural and cultural	data
	heritage considered to be of	
	Outstanding Universal Value.	

National

Table 2: National Plans and Programmes

Plan Name	Summary	Sustainability
		Theme
National Planning Policy	The revised National Planning Policy	Encourage
Framework (NPPF)	Framework sets out government's	Sustainable
	planning policies for England and	Development
	how these are expected to be	
	applied.	

Good Practice Advice Notes	The GPAs address plan-making and	Heritage/cultural
	decision-taking, and other issues	conservation
	which are important in good	
	decision-making affecting heritage	
	assets.	
Historic England Advice Notes	These are advice notes covering	Heritage/cultural
	various planning topics in more	conservation
	detail and at a more practical level.	
	They have been prepared by Historic	
	England following public	
	consultation.	
Ancient Monuments and	To make provision for the	Transparency of
Archaeological Areas Act (1979)	investigation, preservation and	environmental
	recording of matters of	data
	archaeological or historical interest	
	and (in connection therewith) for the	
	regulation of operations or activities	
	affecting such matters.	
The Climate Change Act (2008)	The Act requires the Government to	Climate change
	set legally binding emissions targets,	mitigation
	called carbon budgets, every five	
	years. It also established an	
	independent expert body, the	
	Committee on Climate Change (the	
	CCC), to advise Government on the	
	level of those emissions targets.	
Conservation of Habitats and	These regulations consolidated the	Improve
Species Regulations (2017)	Conservation of Habitats and	biodiversity
	Species Regulations 2010, and	
	made minor modifications.	
	Regulation 43 makes it an offence to	
	deliberately capture, kill or disturb	
	certain wild animals or to trade in	
	them. Regulation 45 prohibits the	
	use of certain methods of capturing	
	or killing wild animals.	

DCLG (2013) CIL Guidance	Explains what the Community	Ensures access
	Infrastructure Levy is and how it	to necessary
	operates. The Community	facilities
	Infrastructure Levy is a charge which	
	can be levied by local authorities on	
	new development in their area. It is	
	an important tool for local authorities	
	to use to help them deliver the	
	infrastructure needed to support	
	development in their area.	
DCLG (2012) Neighbourhood	The guidance explains the	Ensures
Planning	neighbourhood planning system	sustainable
	introduced by the Localism Act,	community
	including key stages and	development
	considerations required.	
DECC (2011) National Energy	Sets out national policy for energy	Climate change
Statement (EN1)	infrastructure. It has effect on the	mitigation
	decisions by the Infrastructure	
	Planning Commission on	
	applications for energy	
	developments.	
Defra (2013) Adapting to	Ensure climate change risk	Climate change
Climate Change: Ensuring	management is systematically	mitigation
Progress in Key Sectors	undertaken by reporting authorities	
	and helps ensure public service and	
	infrastructure are resilient to climate	
	change. Monitors the level of	
	preparedness of key sectors to	
	climate change.	
Defra (2007) The Air Quality	Sets out objectives and policy	Improve air
Strategy for England, Scotland,	options to further improve air quality	quality
Wales and Northern Ireland	in the UK from today and into the	
	long term. These options are	
	intended to provide important	
	benefits to quality of life and help to	
	protect our environment.	

Defra (2011) Biodiversity 2020:	A biodiversity strategy for England	Improve
A Strategy for England's Wildlife	built on the Natural Environment	biodiversity
and Ecosystems Services	White Paper and provided a	
	comprehensive picture of how we	
	are implementing our international	
	and EU commitments. It set out the	
	strategic direction for biodiversity	
	policy for the next decade.	
Defra (2013) Government	Sets out clear priorities for future	Improve
Forestry Policy Statement	policy-making, focused on	biodiversity
	protecting, improving and expanding	
	our public and private woodlands.	
Defra (2005) Making Space for	Takes account of sustainable	Flood risk
Water: Taking forward a new	development and the Government's	management
Government strategy for flood	strategic priorities. Reflects lessons	
and coastal erosion risk	learned from the flood events in	
management in England	recent past. Addresses the	
	challenged and pressures we are	
	facing over the next century such as	
	climate change, development	
	pressures and rising levels of risk	
	and coast.	
Defra (2012) Noise Policy	Aims to promote good health and a	Improve health
Statement for England	good quality of life through the	of residents
	effective management of noise	
	within the context of Government	
	policy on sustainable development.	
Defra (2004) Rural Strategy	Provides the policy framework, the	Improve green
	tools and the evidence base to help	infrastructure
	all Government Departments,	
	regional and local partners work	Sustainability
	together in a collaborative way to	choices made
	deliver more sustainable rural	locally
	communities and an enhanced and	
	enriched countryside.	

Defra (2011) Safeguarding Our	Aims to ensure all England's soils	Improve
Soils	will be managed sustainably and	geodiversity
	degradation threats tackled	
	successfully by 2030.	
Defra (2015) sustainable	Non-statutory technical standards for	Flood risk
Drainage Systems – Non-	the design, maintenance and	management
statutory Technical Standards	operation of sustainable drainage	
for sustainable Drainage	systems to drain surface water.	
Systems		
Environment Act (2005)	Contains a range of measures to	Sustainability
	improve the quality of the local	choices made
	environment by giving local	locally
	authorities and the Environment	
	Agency additional powers to deal	
	with.	
Flood and Water Management	Provides for better, more	Flood risk
Act (2010)	comprehensive management of	management
	flood risk for people, homes and	
	businesses, helps safeguard	
	community groups from unaffordable	
	rises in surface water drainage	
	charges, and protects water supplies	
	to the consumer.	
Flood Risk Regulations (2009)	Provides the Environment Agency	Flood risk
	and local authority's guidance on	management
	their responsibilities when preparing	
	flood risk management plans.	
Government and Forestry Policy	Sets out clear priorities for future	Improve
Statement (2013)	policy-making, focussed on	biodiversity
	protecting, improving and expanding	
	our public and private woodlands.	
Health and Social Care Act	Introduced the first legal duties about	Improve access
(2012)	health inequalities. Sets a framework	to healthcare
	for the public sector to take action to	
	reduce inequalities within England at	
	local and national levels.	

JNCC/Defra (2012) UK Post	Identifies the activities required to	Improve
2010 Biodiversity Framework	complement the country biodiversity	biodiversity
	strategies, and where work in the	
	country strategies contributes to	
	international obligations. In total, 23	
	areas of work were identified where	
	all four countries agreed that they	
	wanted to contribute to, and benefit	
	from, a continued UK focus.	
Localism Act (2011)	Seeks to give effect to the	Sustainability
	Government's ambitions to	choices made
	decentralise power away from	locally
	Whitehall and back into the hands of	
	local councils, communities and	
	individuals to act on local priorities.	
The Marmot Review	Provides evidence about the	Improve access
Implications for Spatial Planning	relationships between health and	to healthcare
(2011)	spatial design, and the socio-	
	economic gradient in environmental	
	disadvantage.	
The 2020 Flood and Coastal	Sets out a vision of a nation ready	Food risk
Erosion Risk Management	for, and resilient to, flooding and	management
Strategy	coastal change – today, tomorrow	
	and to the year 2100.	
National Policy Statements for	Sets out the Government's policy for	Climate change
Energy	delivery of major energy	mitigation
	infrastructure.	
National Policy Statements for	Sets out the Government's policy for	Improve
Transport	delivery of major transport	sustainable
	infrastructure.	transport
National Policy Statements for	Sets out the Government's policy for	Improve water
Water, Waste Water and Waste	delivery of major waste water	quality
	infrastructure.	
Natural Environment and Rural	Created Natural England and the	Improve
Communities Act (2006)	Commission for Rural Communities	biodiversity
	and extended the biodiversity duty	

	set out in the Countryside and Rights	
	of Way Act to public bodies and	
	statutory undertakers to ensure due	
	regard to the conservation of	
	biodiversity.	
Natural Environment White	Recognises that the healthy natural	Improve green
Paper (2011)	environment is the foundation of	infrastructure
	sustained economic growth,	
	prospering communities and	
	personal wellbeing.	
Planning Listed Building	Altered the laws on granting of	Heritage/cultural
Conservation Area Act (1990)	planning permission for building	conservation
	works, notably including those of the	
	listed building system in England	
	and Wales.	
The Rural Economy Growth	A package of measures designed to	Equal access to
Review (2011)	stimulate sustainable growth in the	facilities across
	rural economy and help rural	the borough
	businesses to reach their full	
	potential.	
Urban Waste Treatment	Concerns collection, treatment and	Improve water
Directive (1991)	discharge of urban waste water and	quality
	the treatment and discharge of	
	waste water from certain industrial	
	sectors.	
The Water Act (2014)	Enables greater competition for non-	Improve water
	household customers and gives	quality
	Ofwat new powers to make rules	
	about charges and charges	
	schemes, as well as making	
	provision for flood insurance and	
	drainage boards.	
Wildlife and Countryside Act	The primary legislation which	Improve
1981, as amended)	protects animals, plants and habitats	biodiversity
. ,	in the UK.	

Sub-Regional

Table 3: Sub-regional Plans and Programmes

Plan Name	Summary	Sustainability
		Theme
Staffordshire Local Nature	Has the vision to make Staffordshire a	Importance of
Partnership (LNP)	more prosperous and healthy	both
	environment to live in and believes	economic and
	that economic development can and	environmental
	must go hand-in-hand with the	development
	protection of the County's important	
	environmental assets.	
Landscape Character Areas	LCA documents identify and explain	Strengthen
(LCAs) – Shropshire Cheshire	the unique combination of elements	the quality of
and Staffordshire Plain (NCA 61)	and features that make landscapes	landscapes
and The Potteries and Churnet	distinctive by mapping and describing	
Valley (NCA 64)	character types and areas. LCAs are	
	used to inform planning policies, the	
	allocation of land for development, the	
	assessment of planning applications	
	and the process of Environmental	
	Assessment.	
Meres and Mosses Nature	Focussed on making better places for	Improve
Improvement Area (Defra)	nature, people and communities by	green
	improving and protecting core sites,	infrastructure
	and connecting them by restoring the	
	wetland habitats in and around them.	
River Basin Management Plans	RBMPs set out how organisations,	Improve water
(RBMP) – Humber RBMP, North	stakeholders and communities will	quality
Western District RBMP and	work together to improve the water	
Severn RBMP	environment.	
Staffordshire Trent Valley	A licensing strategy to manage water	Improve water
Abstraction Licensing Strategy	resources in the Staffordshire Trent	quality
(February 2013)	Valley Area.	
Flood Risk Management Plans	FRMPs set out how organisations,	Flood risk
(FRMP) – Humber, North West	stakeholders and communities will	management
and Severn Basin Districts	work together to manage flood risk.	

Severn Trent's Water Resource	Sets out how water will be supplied to	Improve water
		-
Management Plan (2019)	all customers for the next 25 years	quality
	and beyond.	
Stoke-on-Trent and Staffordshire	The LEP brings businesses and local	Improve
Local Enterprise Partnership	authorities together to drive economic	employment
Stoke-on-Trent and Staffordshire	growth, create jobs and raise skill	opportunities
LEP ;Strategic Economic Plan	levels.	
Part 1 – Strategy'		
Staffordshire Chambers Business	Sets out principles of businesses in	Improve
Manifesto 2015	Staffordshire. It identifies barriers to	employment
	employment and economic growth. It	opportunities
	also recommends action by business	
	and policy makers, both local and	
	national, to stimulate enterprise and	
	ambition.	
Stoke-on-Trent and Staffordshire:	Focuses on town and city centre	Protect and
Growth Deal Two	development, with major	enhance the
	improvements to Stoke-on-Trent city	vitality and
	centre access, alongside programmes	viability of
	to enhance the appeal of our	city, town and
	attractive town centre, encouraging	district
	footfall and growing business	centres
	opportunities.	

Local Environmental

Table 4: Local Environmental Plans and Programmes

Plan Name	Summary	Sustainability
		Theme
Staffordshire Historic	A database of over 21,000	Heritage/cultural
Environment Record	archaeological sites and	conservation
	monuments, historic buildings and	
	historic landscapes across the	
	county. The HER also has	
	information on archaeological	
	interventions (such as excavations	

	and surveys) and provides an index	
	to a wide range of sources on the	
	county's historic environment.	
Newcastle-under-Lyme Register	The register is generally used to	Heritage/cultural
of Locally Important Buildings	raise awareness in the community of	conservation
and Structures	our local heritage and to try and	
	protect it from harmful change and	
	demolition.	
Stoke-on-Trent City Council and	Summarises the key evidence and	Improve green
Newcastle-under-Lyme Borough	key challenges arising in relation to	infrastructure
Council Natural and rural	Green Infrastructure (open space)	
Environment Technical Paper	across both Stoke-on-Trent and	
	Newcastle-under-Lyme.	
Staffordshire Biodiversity Action	The SBAP has been in place since	Improve
Plan (SBAP) (1998)	1998 in order to co-ordinate	biodiversity
	conservation efforts in delivering the	
	UK Biodiversity Action Plan targets	
	at a more local level.	
Staffordshire Geodiversity	Produced to influence policy by	Improve
Action Plan (2010)	liaising with local planning authorities	geodiversity
	and ensuring that geodiversity issues	
	are incorporated in to local planning	
	documents.	
Newcastle-under-Lyme Open	A guide to how the Borough Council	Improve green
Space and Green Infrastructure	managed its open space to ensure	infrastructure
Strategies	that the needs of the community are	
	being met in the most appropriate	
	way. The strategy also addresses	
	how land outside of the council's	
	ownership is provided and	
	maintained.	
The Minerals Local Plan for	The new Minerals Local Plan is	Promote
Staffordshire 2015-2030	required to take a positive approach	recycling of
	that reflects the presumption in	materials, and
	favour of sustainable development	where not
	contained in the National Planning	possible,

	Policy Framework. This involves	efficient use of
	meeting objectively assessed needs	resources
	for minerals and should be based on	
	core planning principles including	
	conservation and enhancement of	
	the natural environment and	
	reducing pollution as well as	
	conserving heritage assets.	
Staffordshire and Stoke-on-	Local Authorities across	Encourage
Trent Joint Municipal Waste	Staffordshire and Stoke on Trent	sustainable
Management Strategy 2013	have collaborated to produce a	waste
Refreshed Headline strategy	refreshed Joint Waste Management	management
	Strategy, setting out the direction for	
	Waste Management in Staffordshire	
	up to 2020 and retained the Zero	
	Waste objective. The refreshed	
	document was written in 2013 to	
	create additional outcomes for the	
	remaining years of the Waste	
	Management Strategy.	
Staffordshire Warmer Homes	A scheme run by Staffordshire	Meeting
	County Council, in partnership with	housing needs
	district and borough councils. The	
	goal is to combat fuel poverty across	
	the county and help residents to heat	
	their homes.	
Staffordshire Local Flood Risk	Sets out roles and responsibilities for	Flood risk
Management Strategy 2015	flood risk management, assessed	management
	the risk of flooding in the county,	
	where funding can be found to	
	manage flood risk, what our policies	
	are as a Lead Local Flood Authority	
	and what our objectives and actions	
	are to manage flood risk.	

Newcastle-under-Lyme	The council's strategy to remediating	Promote and
Contaminated Land Strategy	contaminated land and bringing it	enhance the
(2014)	back to successful use.	vitality of city,
		town and
		district centres
Staffordshire County Council	This ROWIP establishes a	Improve
Rights of Way Improvement	framework for managing the rights of	sustainable
Plan – also relevant to	way network over the next 10 years	transport
Newcastle-under-Lyme	and sets out our priorities for	
	improving it to meet the needs of	Strengthen the
	today's users. The ROWIP proposes	quality of
	a series of actions to help achieve	landscapes
	our priorities and will guide the	
	targeting of our resources in future.	
Air Quality Action Plan for	This document details how the	Improve air
Newcastle-under-Lyme 2019-	council is going to be improving air	quality
2024	quality both in the 4 Air Quality	
	action Areas and across the borough	
	as a whole.	

Local Social Plans and Programmes

Table 5: Local Social Plans and Programmes

Plan Name	Summary	Sustainability
		Theme
Staffordshire Health and	Sets out how the group plan to deliver	Improve
Wellbeing Strategy 2015-2020	their vision over the next five years. It	access to
	provides strategic guidance and focus	healthcare
	to enable organisations achieve the	
	identified outcomes which will improve	
	health and wellbeing of the local	
	population.	
Newcastle-under-Lyme Playing	Provides a clear, strategic framework	Improve
Pitch Strategy 2015-2020	for the maintenance and improvement	access to
	of existing outdoor sports pitches and	retail and

	ancillary facilities between 2015 and	leisure
	2020.	facilities
Newcastle-under-Lyme	Aims to shape a local identity with	Protect and
Sustainable Community Strategy	strong, safe and attractive	enhance the
2008-2020	communities and creating a thriving	vitality and
	economy offering opportunity for all.	viability of
		city, town and
		district
		centres
Gypsy and Traveller and	Provides information about the current	Meeting
Travelling Showperson	and future accommodation needs of	housing
Accommodation Assessment	Gypsies and Travellers, and	needs
(2015)	Travelling Showpeople; as well as	
	providing information about additional	
	support needs.	
Newcastle-under-Lyme Housing	Supports the delivery of affordable	Meet housing
Strategy 2016-2021	housing and development and	needs
	provides help and advice for finding a	
	home. Reduces the number of empty	
	homes, gives support to the private	
	sector and promotes independence	
	and inclusion to our most vulnerable	
	residents.	
Newcastle-under-Lyme	This strategy sets out the council's	Reduce
Homelessness and Rough	priorities for the development of its	homelessness
Sleeping Strategy 2020-2025	homelessness strategy for the period	
	2020 to 2025.	
A Whole Life Disability Strategy	A set of principles and actions that will	Equal
for Staffordshire 2018-2023	underpin the way the county council	opportunities
	works with families, communities and	for all
	partners to meet the needs of people	
	with physical or learning disabilities,	
	autism, and sensory impairments.	
Staffordshire Learning	Aims to set out how those who	Equal access
Infrastructure Framework 2015-	provide childcare or education can	to education
2020	work together to make the best use of	for all

money and time. It sets out the	
purpose, principles and approach to	
the provision of education and	
childcare places, infrastructure	
development and capital investment.	

Local Economic Plans and Programmes

Table 6: Local Economic Plans and Programmes

Plan Name	Summary	Sustainability	
		Theme	
Newcastle-under-Lyme Borough	Sets out the council's aspirations and	and Improve	
Council Economic Development	priorities for the next four years and	employment	
Strategy – Growing out People	focuses on place and infrastructure,	opportunities	
and Places 2019-2023	business environment and people and		
	ideas.		
Newcastle-under-Lyme Borough	Seeks to demonstrate how the council Meeting th		
Council Asset Management	deploys its land/property assets to borough		
Strategy 2018/19-2021/22	support the needs of the borough's	needs	
	residents.		
Staffordshire Local Transport	The plan covers walking, cycling,	Improve	
Plan (Staffordshire County	public transport, car based travel and	sustainable	
Council, 2011)	freight, together with the management transport		
	and maintenance of local road and		
	footways.		
Stoke-on-Trent Transport Plan 3	Intended to explain the forward	Improve	
 also relevant to Newcastle- 	transport priorities within the area of	sustainable	
under-Lyme	Stoke-on-Trent with detailed plans for transport		
	future investment in the period		
	2011/12 to 2013/14 but also to		
	provide strategy and direction for the		
	next 15 years, to 2025/26.		

Local Existing Planning Policy

Table 7: Local Existing Planning Policy

Plan Name	Summary	Sustainability	
		Theme	
Newcastle-under-Lyme and	Sets out a broad framework for the	Sustainable	
Stoke-on-Trent Core Spatial	future development of the whole of	development	
Strategy (2006-2026)	Newcastle-under-Lyme and Stoke-on- across be		
	Trent.	areas	
Newcastle-under-Lyme Local	These policies were saved beyond	Sustainable	
Plan (2011) Saved Policies	September 28 th 2007 by the Secretary	development	
	of State for Communities and Local	across	
	Government, and are yet to be	Newcastle-	
	replaced by new policies in the	under-Lyme	
	Newcastle Development Framework.		
	The Newcastle-under-Lyme and		
	Stoke-on-Trent Core Spatial Strategy		
	explains the important history, context		
	and physical characteristics of the		
	area, together with a description of the		
	key challenges and opportunities		
	which the area faces.		
Newcastle-under-Lyme Borough	The Supplementary Planning	Sustainable	
Council Supplementary Planning	Documents (SPDs) support the	the development	
Documents (SPDs)	strategy and policies for Newcastle-	across	
Affordable Housing 2009	under-Lyme in the Core Strategy,	Newcastle-	
 Town Centre 2009 Developer Contributions 2007 Knutton and Cross Heath Development Sites Phase 1 2008 Newcastle-under-Lyme and Stoke-on-Trent Urban Design Guidance 2010 Register of Locally Important buildings and Structures 2012 	which was adopted in 2009.	under-Lyme	

Local Plans

Progression to date of Local Plans within neighbouring authorities is as follows:

- Cheshire East: Local Plan Strategy 2010-2030 was adopted 27 July 2017; Site Allocations & Development Policies Document was submitted for Examination 29 April 2021
- City of Stoke on Trent: Regulation 18 (of the Town and Country (Local Planning) (England) Regulations 2012) Issues & Options Consultation undertaken in Spring/Summer 2021
- Shropshire Local Plan: Regulation 19 Pre-submission draft of the Local Plan consulted upon in late 2020/early 2021
- Stafford: The Plan 2011-2031 was adopted 19 June 2014, with Part 2 (incorporating aspects such as settlement boundaries) adopted 31 January 2017. Work has now commenced on the preparation of new planning policy documents
- Staffordshire Moorlands: The Local Plan 2014-2033 was adopted on 9 September 2020

Baseline Data

The following section sets out baseline requirements, the available relevant data on the three aspects of sustainability – social, economic and environmental. From this baseline data, and the other plans and programmes set out in the previous section, the sustainability criteria will be produced.

Government guidance on Strategic Environmental Assessments and Sustainability Appraisals states that "the term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan. The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities"⁹.

"Wherever possible, data should be included on historic and likely future trends, including a 'business as usual' scenario (i.e. anticipated trends in the absence of new policies being introduced). This information will enable the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic and social trends"¹⁰.

⁹ Planning Practice Guidance Paragraph: 016 Reference ID: 11-016-20190722

¹⁰ Planning Practice Guidance Paragraph: 016 Reference ID: 11-016-20190722

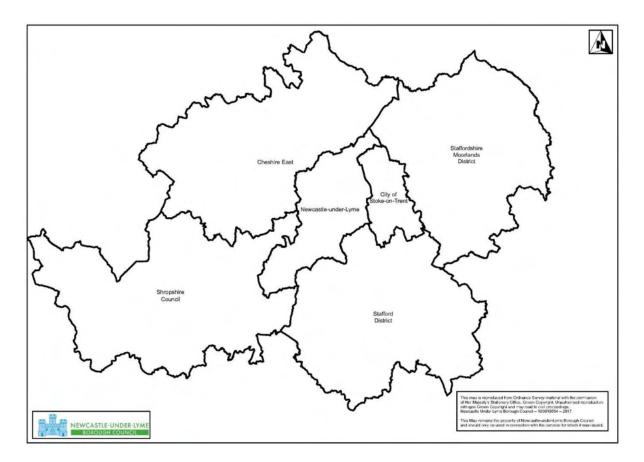
Table 8 shows the baseline data that is required for SA and SEA assessments of plans and programmes. The remainder are considered to be locally important. Note that green boxes indicate information which is required by the Environmental Assessment of Plans and Programmes Regulations 2004.

Social	Economic	Environmental
Population	Material assets	Biodiversity
Human Health	Education	Fauna
Housing	Employment	Flora
Community and safety	Transport (impacts on social	Soil
	and environmental)	
Social inclusion and	Leisure and tourism	Water
deprivation	(impacts on social and	
	environmental)	
		Air
		Climate
		Cultural heritage
		Landscape

Table 8 Baseline data required for SA and SEA assessments of plans and programmes.

Locational Context

The map below (Map A) shows the locational context of Newcastle-under-Lyme. The borough is located between Manchester and Birmingham, and to the west of Stoke-on-Trent. It is also in close proximity to the Peak District National Park, located to the east, and Derby which is located to the south east of Stoke-on-Trent. The county town of Stafford is to the south.



Map A: Locational context of Newcastle under Lyme

Environmental

Biodiversity, Fauna and Flora

The most valuable habitats, species and geological sites are protected through various statutory and non-statutory designations. Sites of nature conservation importance with 'statutory protection' receive protection by means of certain legislation in recognition of their biodiversity or ecological value. 'Non statutory' designations are not protected under legislation, but still possess substantive nature conservation value based on important, distinctive and threatened habitats and species.

European and other International Sites

The borough contains two statutory protected RAMSAR sites; Midland Meres and Mosses Phase 1 & 2 at Betley Mere¹¹. These are recognised as wetlands of international importance under the Ramsar Convention.

¹¹ https://designatedsites.naturalengland.org.uk/

Nationally Designated Sites – Sites of Special Scientific Interest (SSSI)

There are five Sites of Special Scientific Interest (SSSIs) in Newcastle-under-Lyme, and they are as follows:

- Burnt Wood SSSI (located in Loggerheads Ward)
- Maer Pool SSSI (located in Maer & Whitmore Ward)
- Black Firs & Cranberry Bog SSSI (located in Madeley & Betley Ward)
- Betley Mere SSSI (located in Madeley & Betley Ward)
- Metallic Tileries, Parkhouse SSSI (located in Bradwell Ward)

The map below (Fig.1) shows the location of Sites of Special Scientific Interest and Ramsar Sites in Newcastle-under-Lyme.

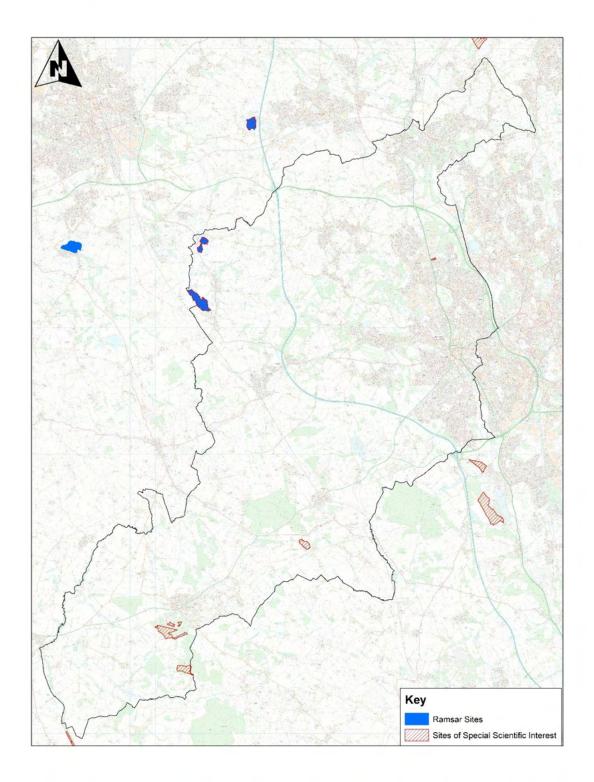


Figure 1 Sites of Special Scientific Interest and Ramsar Sites in Newcastle-under-Lyme

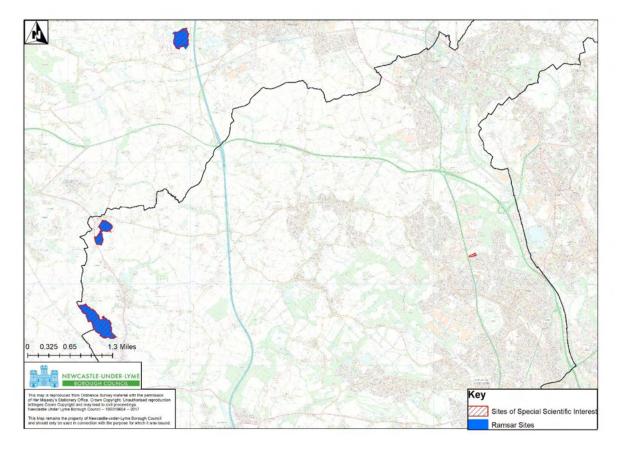


Figure 2 Sites of Special Scientific Interest and RAMSAR sites to the north of Newcastle-under-Lyme

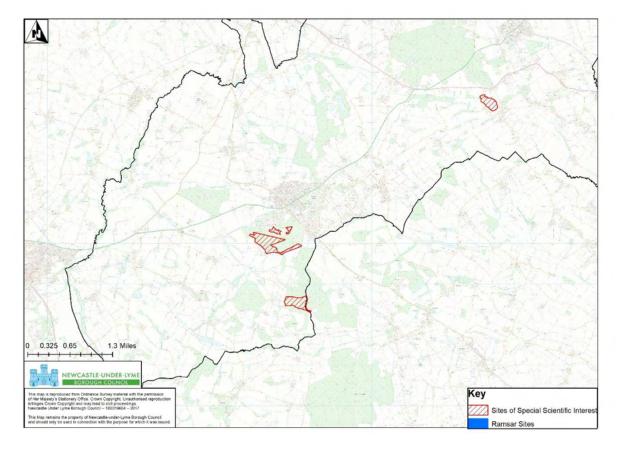


Figure 3 Sites of Special Scientific Interest and RAMSAR sites to the south of Newcastle-under-Lyme

Source: Natural England

Natural England monitors the conditions of SSSIs with the goal of achieving 'favourable condition' status, meaning that all SSSI habitats and features are to be in a healthy state. As of April 2021 the condition monitoring for Burnt Wood was found to be 5.51% Unfavourable – Recovering, with 94.49% Unfavourable – No change. Maer Pool was found to be 100% Unfavourable – Recovering. Black Firs & Cranberry Bog was found to be 100% Unfavourable – No change. Betley Maer was found to be 38.36% Unfavourable – Recovering, with 61.64% Unfavourable - No change. Metallic Tileries, Parkhouse was found to be 100% Unfavourable – No change. As you can see all SSSI's within Newcastle-under-Lyme are in a steady unfavourable condition with no deterioration. In some cases the SSSI's have begun to show some signs of recovery.

Local Wildlife Sites/Local Geological Site

Local Wildlife Sites vary in size and shape and support locally and nationally threatened wildlife. Many of these designations contain habitats and species that are prioritised under the county or UK Biodiversity Action Plans (BAP). Collectively they play a critical role in the conservation of the UK's natural heritage providing wildlife refuges, and acting as corridors

and buffer zones to link and protect other site networks and the open spaces of our towns and countryside.

Non-statutory local designations in Newcastle-under-Lyme include 855 hectares of Sites of Biological Importance, 515 hectares of Biodiversity Alert Sites, 18 hectares of Regionally Important Geological Sites. When considered collectively the local designations comprise of 1388 hectares, and make up 6.6 % of the borough. The map below shows the location of all Local Wildlife Sites in Newcastle-under-Lyme.

Local Nature Reserves (LNRs)

There are four Local Nature Reserves (LNRs) in Newcastle-under-Lyme totalling 140.86 hectares. These are as follows:

- Pathpool Park LNR 57.3 hectares (located in Talke & Butt Lane Ward)
- Bateswood LNR 55.68 hectares (located in Audley Ward)
- Pool Dam Marshes LNR 10.99 hectares (located in Thistleberry Ward)
- Bradwell Woods LNR 16.89 hectares (located in Bradwell Ward)

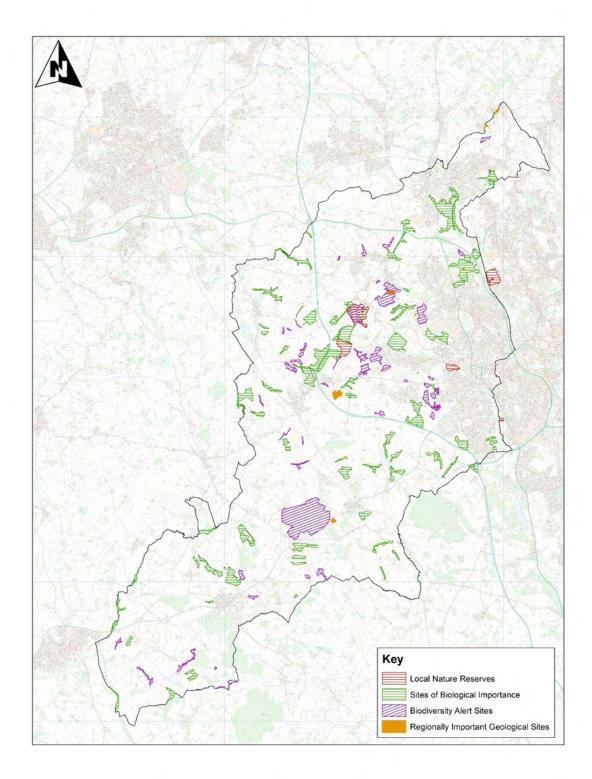


Figure 4 Local Wildlife Sites in Newcastle-under-Lyme

Source: Staffordshire Wildlife Trust

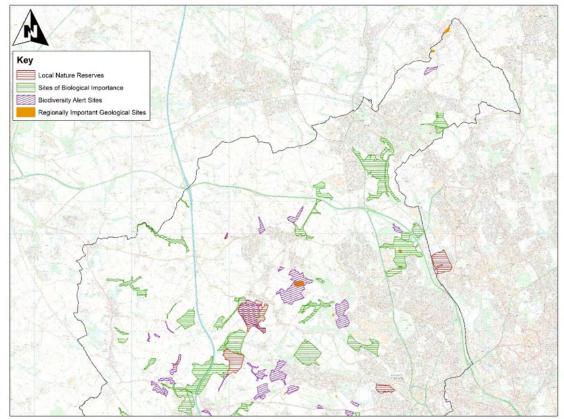


Figure 5 Local Wildlife Sites in the north of Newcastle-under-Lyme

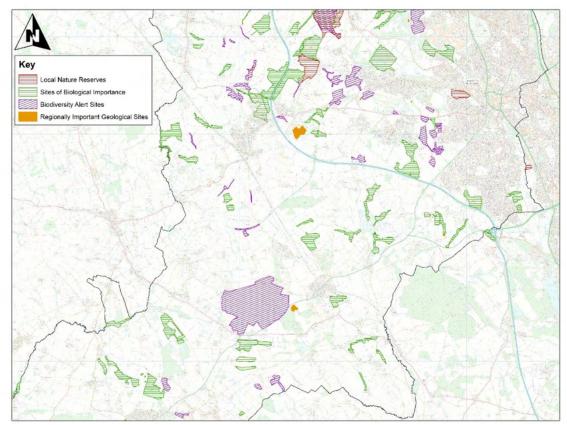


Figure 6 Local Wildlife Sites in the central band of Newcastle-under-Lyme

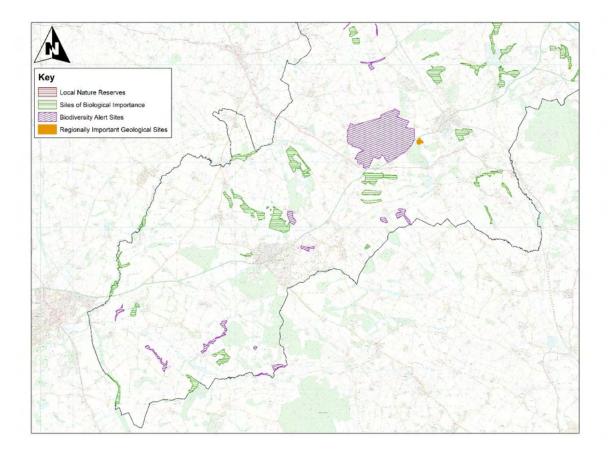


Figure 7 Local Wildlife Sites in the south of Newcastle-under-Lyme

UK BAP Priority Habitats

The UK BAP priority habitats cover a wide range of semi-natural habitat types, and are identified as being the most threatened and requiring conservation under the UK Biodiversity Action Plan (UK BAP).

As a result of devolution, and new country-level and international drivers and requirements, much of the work previously carried out by the UK BAP is now focussed at a country-level rather than a UK-level, and the UK BAP was succeeded by the 'UK Post-2010 Biodiversity Framework' in July 2012. The UK list of priority habitats, however, remains an important reference source and has been used to help draw up statutory lists of priority habitats in England, Scotland, Wales and Northern Ireland, as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (England).

The original list of UK BAP priority habitats was created between 1995 and 1999. In 2007, however, a revised list was produced, following a 2-year review of UK BAP processes and priorities, which included a review of the priority species and habitats lists – see the Report of the Species and Habitat Review for more information. Following the review, the list of UK BAP priority habitats increased from 49 to 65. All of the habitats from the original list were carried over to the 2007 list, although some names and categorisations were revised, and some new

habitats were added. Selection of UK habitats for the priority list followed consideration by expert working groups against a set of criteria, based on international obligations, risk, and the importance for key species.

Newcastle-under-Lyme has 1797.01 hectares of priority habitats identified by Natural England. These comprise of Coastal and Floodplain Grazing Marsh (85.69 hectares), Deciduous Woodland (1490.78 hectares), Semi-Improved Grassland (141.33 hectares), Lowland Dry Acid Grassland (2.28 hectares), Lowland Fens (17.19 hectares), Lowland Heathland (20.03 hectares), Lowland Meadows (8.18 hectares), Lowland Raised Bog (23.89 hectares), Purple Moor Grass and Rush Pasture (2.55 hectares), Reedbeds (1.68 hectares) and Traditional Orchards (3.41 hectares).

Open Space

Previous documents in Newcastle-under-Lyme have used the title 'Green Space'. The National Planning Policy Framework and Planning Practice Guidance makes preferential reference to 'Open Space'. Therefore to be consistent with the NPPF, the term 'Open Space' is now used.

The Newcastle-under-Lyme Open Space Strategy 2017 paper was produced as a review and guide to ensure the Borough Council manages its open space asset base and that the needs of the community are met. The audit completed for the paper includes the 'open space types' listed in table 9. It should be noted that outdoor sport facilities are not part of the Open Space Strategy as they are audited by the Sport England Compliant Playing Pitch Strategy.

Table 9 shows that the borough of Newcastle-under-Lyme is well provided for in terms of open space. The borough has significant higher amounts of natural and semi-natural open space compared to the standard set¹².

Open Space Type	Count	Area (Ha.)	Current Provision (Hectares per 1000 population based on 124,381 pop)	Previous Standard (Hectares per 1000 population)	Proposed Standard (Hectares per 1000 population)
Parks and gardens	35	436.29	3.51	2.35	3.10
Amenity open space	112	128.31	1.03	No standard	0.90

¹² Newcastle-under-Lyme Open Space Strategy 2017

Natural and	181	1746.22	14.0	3.60	3.60
semi-natural					
open space					
Designated	81	51.35	0.41	0.76	0.41
play spaces					
for children					
and young					
people					
Allotments	12	13.6	0.11	No Standard	0.15
Green	16	46.03	0.37	No Standard	No Standard
Corridors					
Outdoor Sport Facilities		No standard			

Table 9 Open Space Standards for Newcastle-under-Lyme (2017)¹³

The three Framework Plans (Newcastle Urban, Kidsgrove Urban and Newcastle Rural) accompanying the Open Space Strategy provide a more detailed understanding of distribution, and the surplus and deficits of specific open space typologies. It should be noted that as the population of the borough grows, localised deficits of open space will increase, and there is a need for new open space to accompany new development, to ensure that the open space provision keeps pace with population growth.

Ancient Woodland

Ancient Woodland is defined as an area of woodland that has existed continuously since the year 1600 in England. Natural England's Ancient Woodland Inventory identifies 112 individual Ancient Woodland sites totalling 707.60 hectares in Newcastle-under-Lyme. The map below shows the locations of Ancient Woodland in Newcastle-under-Lyme.

¹³ Newcastle-under-Lyme Open Space Strategy 2017

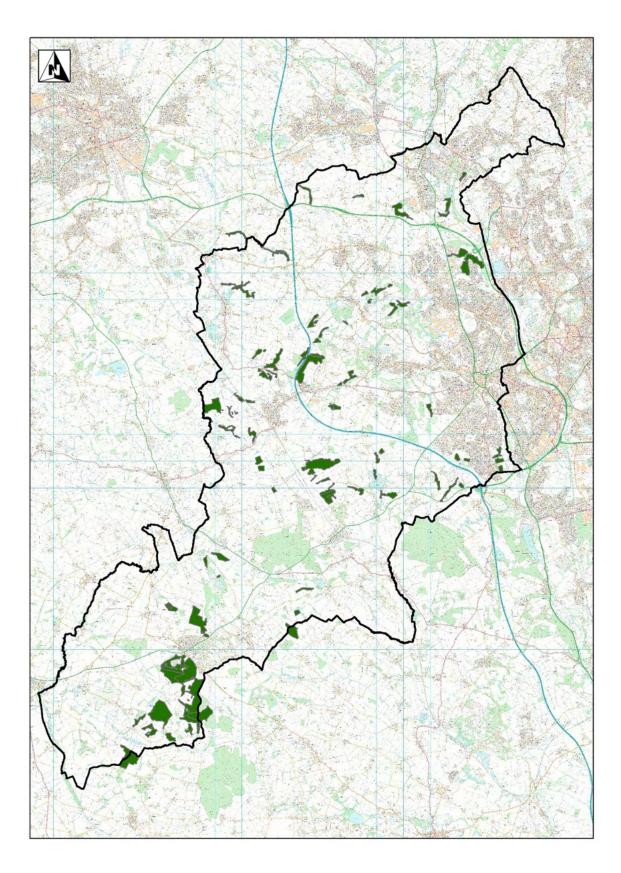


Figure 8 Ancient Woodland in Newcastle-under-Lyme

Source: Natural England

Soil and Agricultural Land Classification

The agricultural land classification system identifies five grades of land. These are as follows:

- Grade 1 excellent quality agricultural land
- Grade 2 very good quality agricultural land
- Grade 3 good to moderate quality agricultural land

Subgrade 3a - good quality agricultural land

Subgrade 3b - moderate quality agricultural land

- Grade 4 Poor quality agricultural land
- Grade 5 very poor quality agricultural land

The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is considered the most flexible, productive and efficient in response to inputs. One of the main factors in assessing this grade relates to soil characteristics. The north east of Newcastle-under-Lyme borough is predominantly urban, reflecting the built up character of Newcastle-under-Lyme and Kidsgrove. The majority of agricultural land in the borough's rural area is classified as Grade 3. There are also areas of Grade 4 land to the north east of the borough and some areas of Grade 2 to the south west. There is no Grade 5 land in the Newcastle-under-Lyme borough. The map below shows the agricultural grades across Newcastle-under-Lyme.

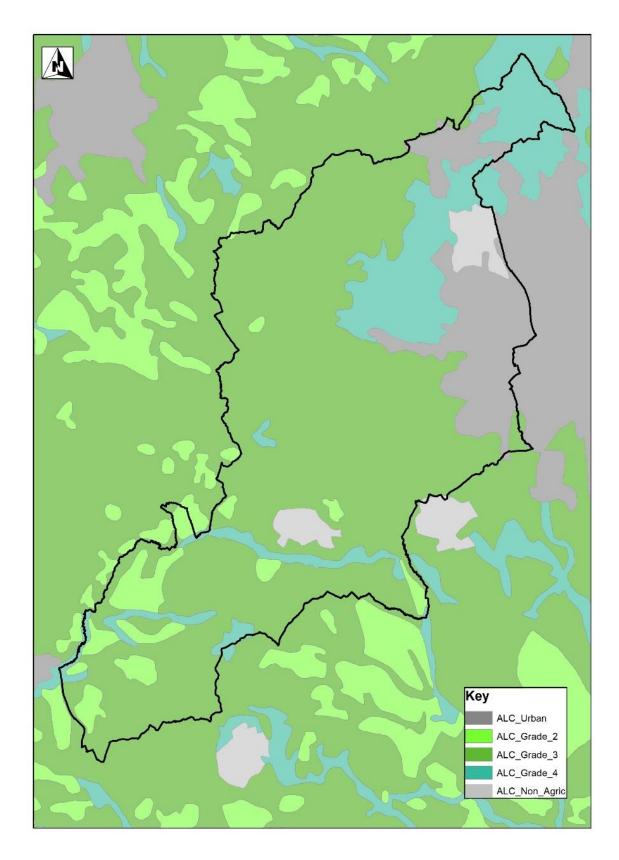


Figure 9 Agricultural Land Classification Grades across Newcastle-under-Lyme

Source: Natural England

Contaminated Land

Newcastle-under-Lyme Borough Council holds a Public Register of contaminated land. The list contains sites which have been determined to be contaminated within the statutory definition of being contaminated, and a Remediation Notice, Statement or Declaration has been issued.

Water

The Environment Agency holds data on flood risk from rivers to surface water. Flood risk is a combination of the probability and the potential consequences of flooding from all water sources including rivers, sea, rainfall, ground and surface water, sewers, drainage systems, reservoirs, canals, lakes and other artificial sources. The Environment Agency classifies the likelihood of flooding in zones. These are as follows:

- Flood Zone 1 land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
- Flood Zone 2 land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% 0.1%) in any year.
- Flood Zone 3 land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

The maps below show areas of Flood Zones 2 and 3 in Newcastle-under-Lyme.

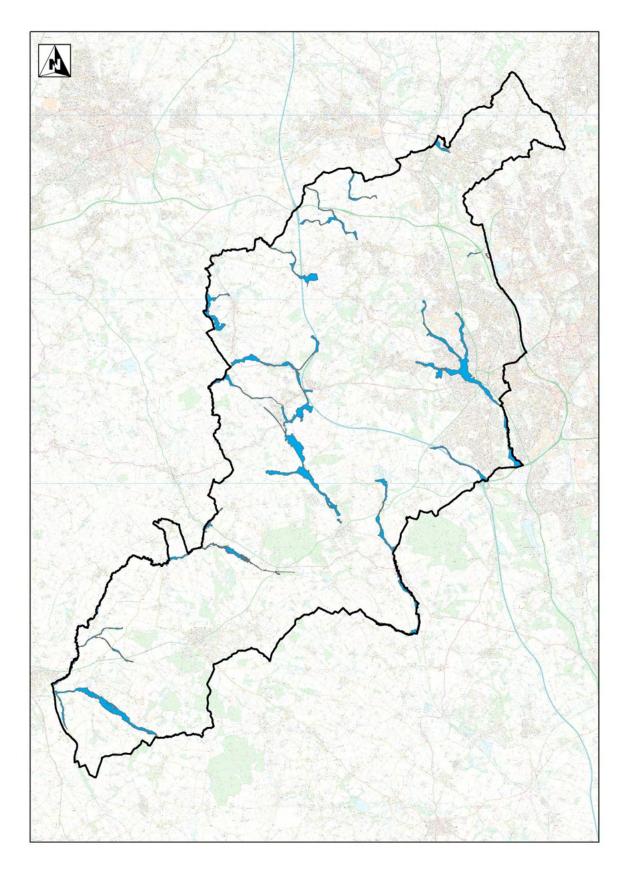


Figure 10 Flood Zone 2 in Newcastle-under-Lyme

Source: Environment Agency

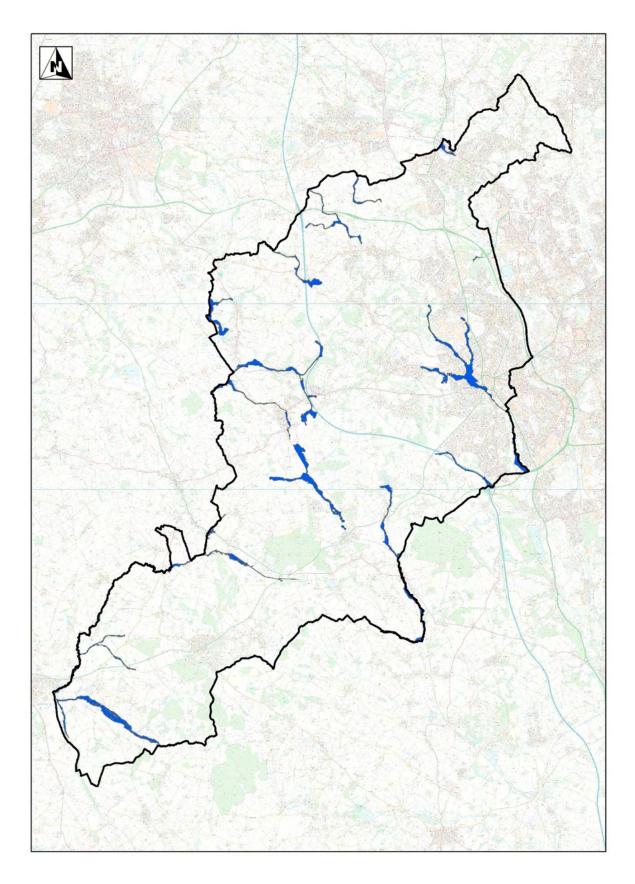


Figure 11 Flood Zone 3 in Newcastle-under-Lyme

Source: Environment Agency

The Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment 2019 provides a strategic assessment of risk from all sources of flooding in the borough. The assessment recognises surface water and fluvial flooding as the prominent source of flooding. The borough's primary fluvial flood risk is along the Lyme Brook, a tributary of the River Trent. This presents a fluvial flood risk, primarily, to the Town Centre, including Brook Lane and the Poolfields area. There is also a risk of flooding from the Lyme Brook in the villages of Silverdale, Knutton and Cross Heath. To the south of the Town Centre, Clayton is also at risk from flooding from Lyme Brook. The River Lea presents a flood risk to the villages of Madeley and Madeley Heath. Smaller tributaries and brooks in the borough including Checkley Brook, Coal Brook, Mere Gutter (associated with Betley Mere), Dean Brook, Valley Brook, Meece Brook and Fowlea Brook have localised flooding in their immediate areas.

Surface Water

Surface water runoff (or pluvial flooding) typically occurs from intense rainfall, i.e. thunderstorms, which can overwhelm the drainage network not designed to cope with extreme storms. Surface water flooding can occur as a result of drain blockages, sewers being at capacity or high water levels in watercourses that cause local drainage networks to back up. The Environment Agency identifies three levels of surface water flood risk which are as follows:

High - each year, the area has a chance of flooding of greater than 1 in 30Medium - each year, the area has a chance of flooding of between 1 in 100Low - each year, the area has a chance of flooding of between 1 in 1000

The maps below show the levels of surface water flood risk in Newcastle-under-Lyme.

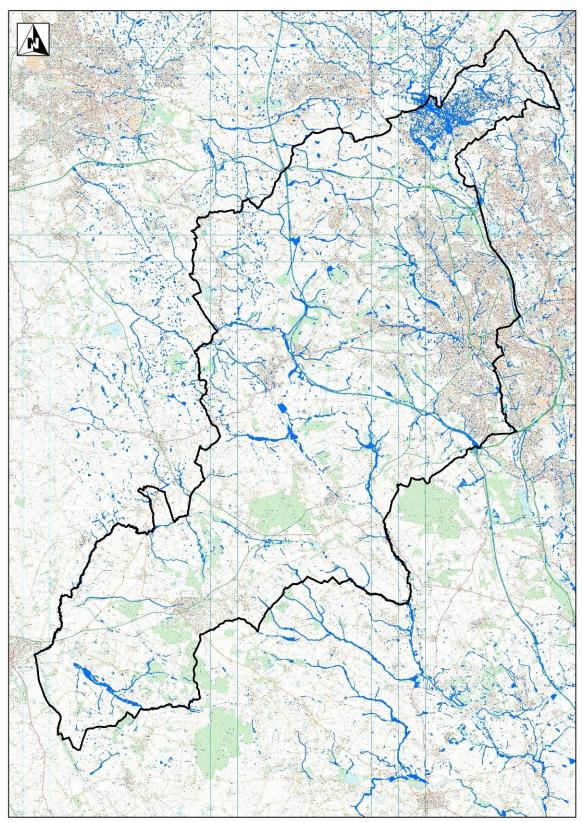


Figure 12 High Level Flood Risk, 1 in 30 Years, Newcastle-under-Lyme

Source: Environment Agency

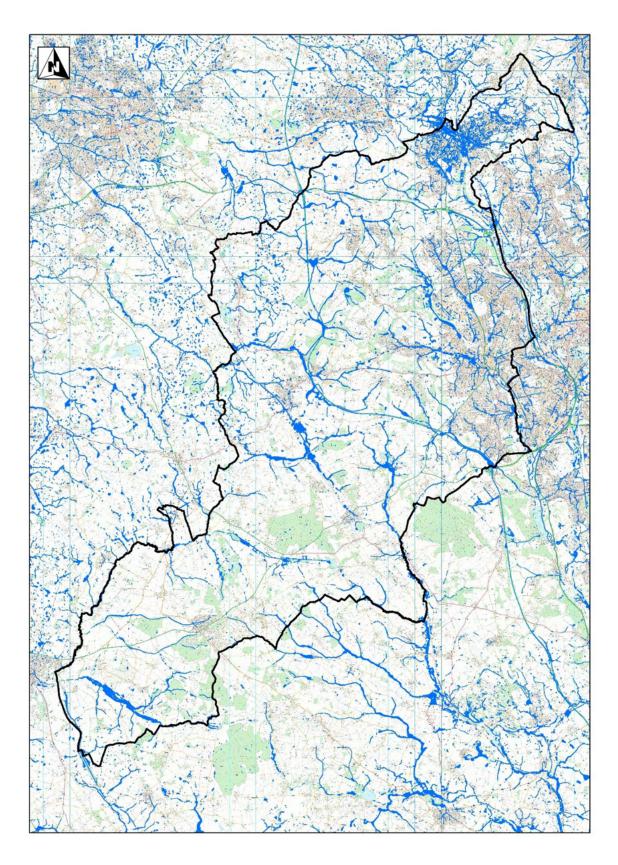


Figure 13 Medium Level Flood Risk, 1 in 100 Years, Newcastle-under-Lyme

Source: Environment Agency

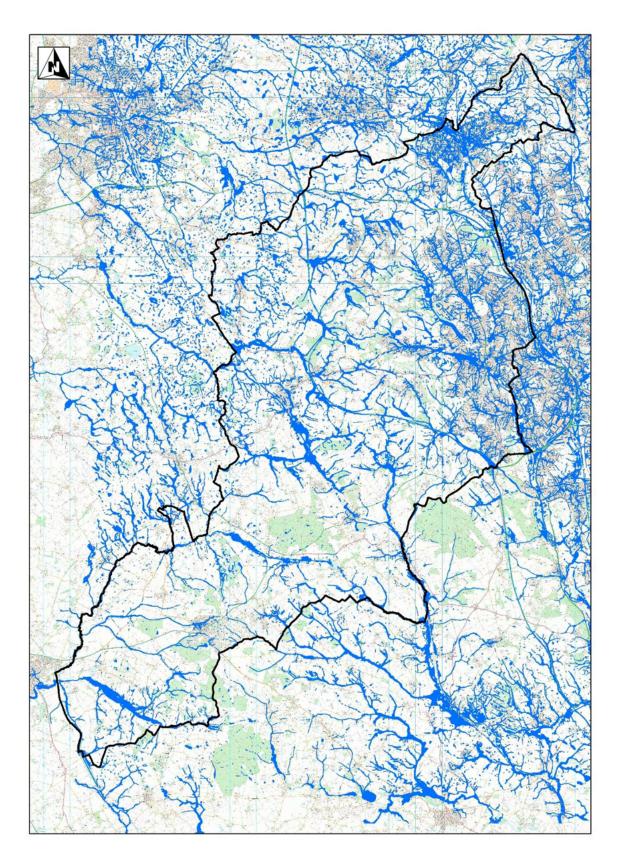


Figure 14 Medium Level Flood Risk, 1 in 1000 Years, Newcastle-under-Lyme

Source: Environment Agency

The Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment identifies surface water flood risk in the borough, predominantly within the urban areas of Newcastle and Kidsgrove as a result of rapid urbanisation, and where smaller watercourses were culverted, and in some cases, built over. The urban area of Newcastle and Silverdale was recognised in the local FRM Strategy as being one of the top ten urban areas at risk of surface water flooding in the county, with an estimated 632 properties at risk. Kidsgrove has known issues with the capacity of the sewer network. Areas that have seen the highest occurrences of sewer flooding are the most densely populated, in particular Kidsgrove, Talke, Audley and Bignall End. Rural areas that have been impacted by sewer flooding include Madeley and Betley.

Water Quality

The Newcastle-under-Lyme Water Cycle Study 2020: Phase 1 shows the Water Framework Directive status of waterbodies across Newcastle-under-Lyme. The map below shows the status of Coal Brook, Loggerheads Brook (Poor), River Tern (Moderate), Meece Brook (Bad), River Lea (Bad), Checkley Brook (Good), Lyme Brook (Poor), Fowlea Brook (Moderate), Valley Brook (Poor) and the Trent and Mersey Canal (Good). The study shows that the status of waterbodies across Newcastle-under-Lyme mostly ranges between poor and moderate.

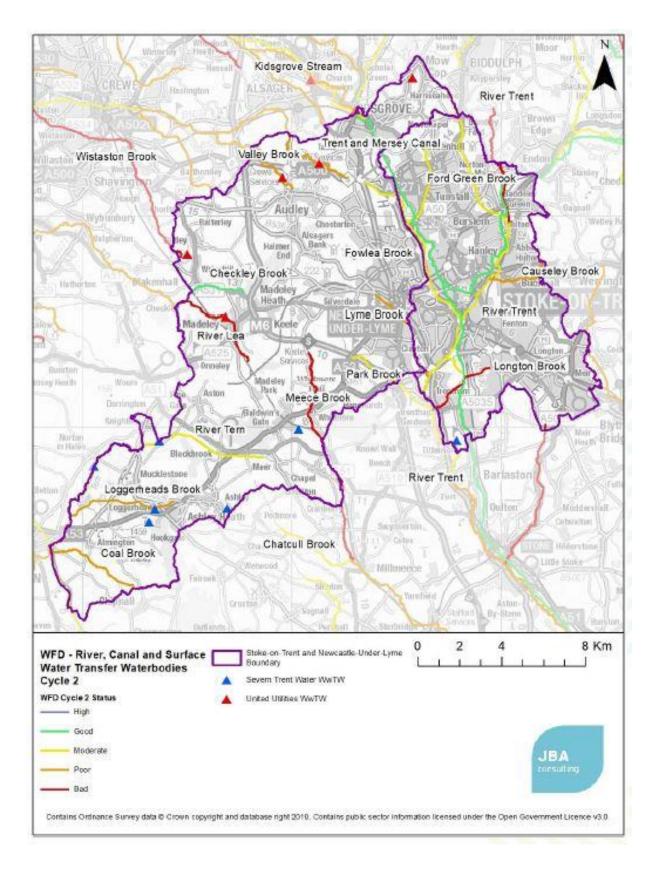


Figure 15 Water Framework Directive status of waterbodies across Newcastle-under-Lyme

Source: Newcastle-under-Lyme Water Cycle Study 2020: Phase 1

Newcastle-under-Lyme falls within a Nitrate Vulnerable Zone (NVZ). NVZs are designated areas of land that drain into waters polluted by nitrates from agricultural sources. Types of polluted waters include the following:

- **Surface Waters** areas of land that drain into a freshwater water body which has or could have is action is not taken, a nitrate concentration greater than 50mg/l
- **Groundwater** water held underground in the soil or in pores and crevices in rock, which has or could have if action is not taken, a nitrate concentration greater than 50mg/l
- Eutrophic Waters bodies of water, mainly lakes and estuaries, that are or may become enriched by nitrogen compounds which cause a growth of algae and other plant life that unbalances the quality of the water and to organisms present in the water

Water Extraction

The Environment Agency has a CAMS: Staffordshire Trent Valley Abstraction Licensing Strategy which was published in 2013. This provides information on how existing abstraction is regulated and whether water is available for further extraction within the Trent Valley river basin. The strategy identifies that water flow rates in the Trent Valley within the plan area, (upstream of Strongford) are sufficient to allow licenses to be made available for water extraction for at least 50% of the time. It also notes however that the Meece Brook, which flows through Newcastle's rural area, has deficits in the water required to support the environment and so it is currently closed to further abstraction. The Environment Agency have advised that the Abstraction Licensing Strategy for this area is due to be updated. As a result the resource availability could change in future.

Groundwater Quality

The plan area for the new Local Plan covers several Water Framework Directive Groundwater Bodies. This makes it difficult to provide a general picture of the area. However, the Environment Agency has advised that the 'Staffordshire Trent Valley – Coal Measures Stoke' (GB40402G304600) Groundwater Body covers most of Newcastle-under-Lyme. Therefore, the SA Scoping Report should refer to data from the Humber, North Western District and Severn River Basin Management Plans (RBMP) in relation to this water body. As of 2019 the overall status of the groundwater body was 'good', with the quantitative status 'good' and the chemical status 'good'¹⁴

¹⁴ https://environment.data.gov.uk/catchment-planning/WaterBody/GB40402G304600

Air

Air quality has been monitored in the borough of Newcastle-under-Lyme over the last twenty years, by using Nitrogen dioxide diffusion tubes and an automatic monitoring station, which monitors real time concentrations of Nitrogen dioxide (NO₂) in the air. This substance is monitored because it is found in vehicle exhaust fumes, which is the main source of pollution within the Borough. Furthermore the council has been able to identify that NO₂ emissions from road traffic exceed the limits set down in law, in four areas of the borough.

In 2015 four geographical areas of the borough were declared as Air Quality Management Areas (AQMA) due to exceedances of objective levels of nitrogen dioxide. These areas include Newcastle Town Centre, Maybank, Kidsgrove and Little Madeley. With the input of other sectors (i.e. Highways England, Staffordshire County Council) Air Quality Action Plans (AQAP) for each AQMA are now in place to address the different ways in which levels of pollution can be reduced by managing traffic more efficiently, and encouraging walking, cycling, and the use of public transport across the borough. Monitoring of congestion across the key district transport routes has been recognised as a key indicator by Staffordshire County Council, and may be an important indicator for future impact on local air quality.

Since declaring the AQMA's no new sources of emissions have been identified. The latest Air Quality Annual Status Report 2019 confirmed that the overall Nitrogen dioxide levels in the borough are falling, with the majority of monitoring sites showing annual mean concentrations below the annual mean objective. However, work needs to be done to ensure that further developments, and changes to the road networks across the Borough do not lead to an increase in the annual NO₂ concentration above the annual mean objective of 40µg/m3.

	2014/15	2015/16	2016/17
Newcastle-under-Lyme	6.2%	6.1%	6.2%
England	6.0%	5.9%	5.9%

Table 10 Prevalence of asthma in Newcastle-under-Lyme 2014-2017

	2014/15	2015/16	2016/17
Newcastle-under-Lyme	2.3%	2.4%	2.4%
England	1.8%	1.9%	1.9%

Table 11 Prevalence of chronic obstructive pulmonary disease in Newcastle-under-Lyme 2014-2017

	2014/15	2015/16	2016/17
Newcastle-under-Lyme	3.7%	3.6%	3.6%
England	3.2%	3.2%	3.2%

Table 12 Prevalence of coronary heart disease in Newcastle-under-Lyme 2014-2017

Tables 10, 11 & 12 shows that Newcastle-under-Lyme is above the England average for cases of asthma, chronic obstructive pulmonary disease and coronary heart disease. These diseases are considered to be indicators of poor air quality

	2011	2012	2013	2014	2015	2016
Newcastle-under-	4.8%	4.6%	4.9%	4.7%	4.2%	4.7%
Lyme						
England	5.4%	5.1%	5.3%	5.1%	4.7%	5.3%

Table 13 Mortality attributable to air pollution in Newcastle-under-Lyme 2011-2016

Table 13 shows approximately 5% of Newcastle's mortality is attributable to air pollution. Whilst Newcastle-under-Lyme's percentages are marginally below the country average, they are considered to be similar to the national picture¹⁵.

Climate

Through the production of a series of Synthesis Reports the Intergovernmental Panel on Climate Change (IPCC) provide a comprehensive assessment on climate change, its implications, potential future risks, and options for adaptation and mitigation. The reports confirm that human influence on the climate system is growing with impacts observed across all continents and oceans. The Intergovernmental Panel on Climate Change 5th Assessment Report identifies changes in extreme weather and climate events, with decreasing cold temperatures, increasing warm temperatures, increasing extreme high sea levels and increasing number of heavy precipitation events.

The Baseline Report that forms part of the Staffordshire Climate Study 2020 compliments the trends outlined within the IPCC 5TH Assessment Report. The Baseline Report anticipates that Staffordshire will move towards warmer wetter winters, hotter drier summers, with an increase in the frequency and intensity of extreme events. Furthermore, Staffordshire is exposed to a number of climate related risks, particularly flooding. The Baseline Report goes on to describe the levels of fuel consumption and emission of Greenhouse Gases (GHG) by sector within Newcastle-under-Lyme. As of 2018, the following was observed:

• Largest proportion of fuel consumed was petroleum products (44.5%), with gas and electricity accounting for 38.6% and 14.7%. Other fuels, including bioenergy & waste, coal, and manufactured fuels make up the remaining 2.2%.

¹⁵ Newcastle-under-Lyme borough Council Air Quality Action Plan 2019-2024

- Road transport sector accounts for the highest proportion of fuel consumption in Newcastle-under-Lyme (41%), followed by the domestic and industrial & commercial sectors (31.5% and 26.5%). Within the domestic sector, approximately 73.7% of fuel consumed is gas and 19% is electricity. In the industrial & commercial sector, approximately 58.2% of fuel consumed is gas and 32.9% is electricity.
- Largest portion of emissions result from petrol and diesel used in road transport (38%), followed by residential buildings (27%). Within the residential sector, the use of natural gas (e.g. for heating, hot water and cooking) accounts for the majority of GHG emissions.
- Non-domestic buildings collectively account for around 25% of total emissions.
- Motorways represent around 45% of road transport emissions for Newcastle-under-Lyme, or around 17% of the total emissions.

It is no secret that fuel consumption and the greenhouse gas emissions they generate are having an impact on our climate, and measures must be taken towards climate change mitigation and adaption. In 2019 Newcastle-under-Lyme Borough Council declared a Climate Emergency with the aim of making Newcastle-under-Lyme a carbon-neutral borough by 2030.

Cultural Heritage

Listed Buildings and Structures

There are 381 listed buildings and structures in Newcastle-under-Lyme. Of these, 3 are Grade I, 25 are Grade II* and 353 are Grade II¹⁶.

Newcastle-under-Lyme Borough Council also hold a Register of Locally Important Buildings and Structures. The register is generally used to raise awareness in the community of the local heritage and to try and protect it from harmful change and demolition¹⁷.

Scheduled Ancient Monuments

Scheduled Ancient Monuments are of national importance and have legal protection under the ancient Monuments and Archaeological Areas Act 1979.

There are 13 Scheduled Ancient Monuments in Newcastle-under-Lyme. These are:

• Motte and Bailey, Castle Hill;

¹⁶ https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/historic-buildings-and-structures

¹⁷ https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/registerlocally-important-buildings-and-structures

- Audley's Cross, Tyrley;
- 'Auctioneers Mound' near Ashley Church;
- Hales Roman Villa & pre-Roman structures;
- 'Devil's Ring and Finger' whirl stones, near Oakley Hall;
- Moated Site, Willoughbridge Park;
- Heighley Castle;
- Old Madeley Manor;
- Berth Hill Camp;
- Bowl Barrow, Maer Hills;
- Moated Site, Lea Head Manor;
- Castle Motte, silverdale Road;
- Springwood Blast Furnace¹⁸.

Registered Parks and Gardens

There are 2 registered parks in Newcastle-under-Lyme. These are:

- Keele Historic Parks and Gardens Grade II;
- Maer Historic Parks and Gardens Grade II.

"The Register was established in 1983 and confers special statutory protection for these sites and gives them a Grade I, II* or II grading like Listed Buildings, reflecting their national historic interest. The purpose of the Register is to celebrate designed landscapes. Registration is a material consideration in the planning process. Local Planning Authorities must consider the impact of a proposal on the special character of the area"¹⁹.

Conservation Areas

There are currently 21 conservation areas within the borough of Newcastle-under-Lyme, none of which to date have been identified as being at risk. Of the 21 Conservation Areas, the Borough Council has produced 11 Conservation Area Appraisals & Management Plans which define the special interest of the conservation area that merits its designation and describes & evaluates the contribution made by the different features of its character and appearance.

¹⁸ https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/historicbuildings-and-structures

¹⁹ https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/registered-parks-and-gardens

An indicative programme for the preparation of appraisals and management plans over the period to 2030 has also been produced by the Borough Council.

12 of these conservation areas are subject to Article 4 Direction. Article 4 Direction allows the council to "remove and make certain restrictions on the kind of alterations allowed, depending on how it might affect the area's character. This affects things like porches, changing historic doors and windows and other distinctive architectural features and removing or putting up walls, gates or fences".

Conservation areas which are subject to Article 4 Directions are marked with an * below.

- Audley * (designated 1976, extended 2013);
- Basford * (designated 2006, expended 2007);
- Betley * (designated 1970, extended 2008);
- The Brampton * (designated 1984, extended 2016);
- Butterton * (designated 2006);
- Clayton (designated 1992);
- Keele * (designated 1989, extended June 2018);
- Keele Hall (designated 1993);
- Kidsgrove (designated 1997);
- Madeley * (designated 1972, extended 2012);
- Maer * (designated 1970, extended 2019);
- Mucklestone (designated 1977);
- Newcastle-under-Lyme (designated 1973, extended 2000 and 2008);
- Shropshire Union Canal (designated 1984);
- Silverdale (designated 1993);
- Subbs Walk * (designated 1993, reviewed 2016);
- Talke (designated 2000);
- Trent and Mersey Canal (designated 1988);
- Watlands Park * (designated 2016);
- Whitmore * (designated 1971);
- Wolstanton * (designated 1993, extended 1997)²⁰.

²⁰ https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/conservation-areas

Local Listing

Local heritage lists are compiled by local authorities to identify historic buildings and structures which have not been given a formal designation by Historic England, but are considered to be of significant local importance, enough to have material consideration in the planning process.

Newcastle-under-Lyme's Register of Locally Important Buildings and Structures was last updated in 2020 and includes 135 buildings or structures. This is an increase of 34 new additions since the last review took place in 2014. The criteria used for determining whether a building or structure should be added to the register are; authenticity, architectural interest, historic interest, visual importance and community value²¹.

Landscape

The area that the new Local Plan will cover falls within two national landscape character areas; Shropshire, Cheshire and Staffordshire Plain (NCA 61), and The Potteries and Churnet Valley (NCA 64). Natural England has published National Character Area profiles for both of these areas.

Staffordshire County Council has adopted a Planning for Landscape Change Supplementary Planning Guidance document. This is intended to guide decisions which may affect the conservation, enhancement and restoration of rural landscapes in the county. This document was adopted in 2001 and is intended to be updated and replaced by new guidance soon. When adopted, this new guidance will be used to inform assessments of potential impact on the landscape.

Social

Population

Tables 14 & 15 below provide information on the population of Newcastle-under-Lyme.

	Population Males	Population Females	Population Total	
Newcastle-under-Lyme	61,206	62,665	123,871	

Table 14: Population by gender

Age Groups	Newcastle-under-Lyme
0-4	5.1%
5-7	3.2%

²¹ https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/register-locally-important-buildings-and-structures

8-9	1.9%
10-14	5.6%
15	1.1%
Below 16 years of age	16.9%
16-17	2.4%
18-19	3.4%
20-24	7.7%
16-24	13.5%
25-29	5.6%
30-44	18.8%
45-59	20.2%
60-64	6.8%
25-64	51.4%
65-74	9.7%
75-84	6.2%
85-89	1.6%
Age 90 and over	0.7%

Table 15: Population by age-group

Human Health

Life expectancy and mortality data enable us to monitor how Newcastle-under-Lyme is developing as a healthy city. As it is difficult to assess which aspects of our populations' health are improving or declining, lifestyle choices which can be influenced by the surrounding environment and wider determinants of health have been considered below.

Life Expectancy

Life expectancy at birth provides an estimate of the number of years a new-born baby would live were they to experience age-specific mortality rates for that time period, in a particular locality throughout their life. It is important to note that these figures do not estimate the number of years a baby born in the area in each time period would actually expect to live nor can it be used to guide remaining years of life.

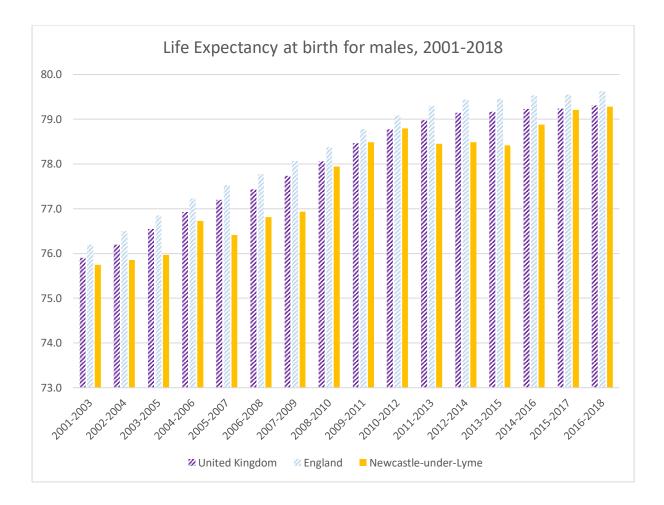


Figure 16 Office for National Statistics, 2019

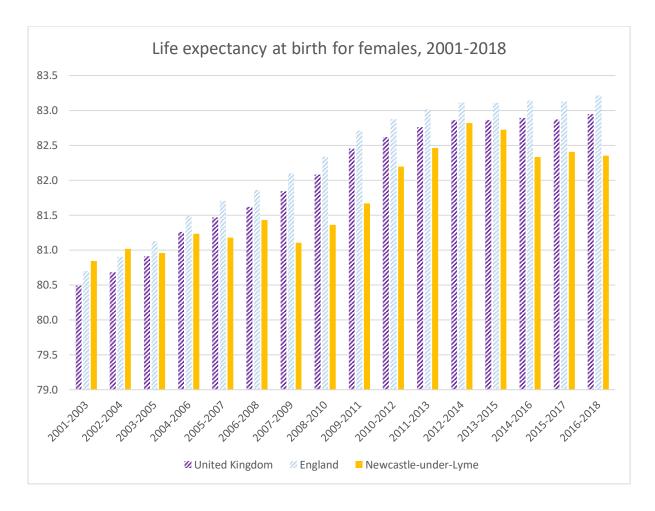


Figure 17 Office for National Statistics, 2019

Figures 16 and 17 show that the life expectancy for both males and females at birth is lower in Newcastle-under-Lyme in comparison to England and the United Kingdom. Whilst figure 16 shows that the difference between the borough and the country is closing for males (-0.3yrs) in 2018, figure 16 shows that the gap is much larger for females. Figure 17 shows that the life expectancy for females in the borough is 0.8 years lower than England.

Mortality

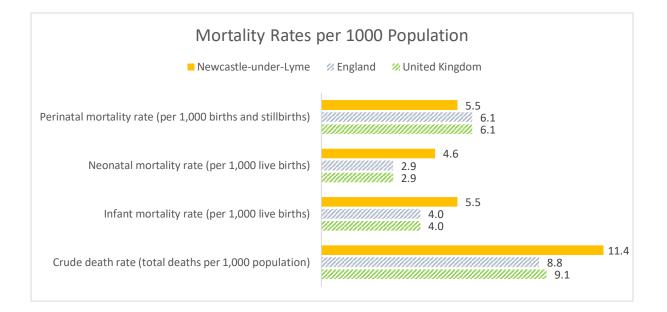


Figure 18 Office for National Statistics, 2021

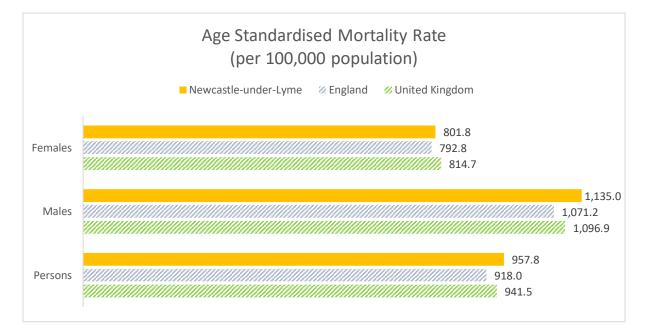




Figure 18 shows that the neonatal, infant and crude mortality rate is higher in Newcastleunder-Lyme compared to England and the United Kingdom. However, the perinatal mortality rate is lower in the borough. Figure 19 also shows that whilst the male mortality rate is higher in the borough than in England and the United Kingdom, the female mortality rate in the borough is lower. However, the average for both males and females is higher compared to the country.

Lifestyle Indicators

Physical Activity

Regular physical activity provides a range of physical and mental health benefits. These include reducing the risk of disease, managing existing conditions, and developing and maintaining physical and mental function. Physical activity plays a role in maintaining a healthy weight – including the prevention of weight gain and reduction in body fat. However, irrespective of any change in weight, people who are overweight or obese will reduce their risk of cardiovascular disease and improve their health by being physically active²².

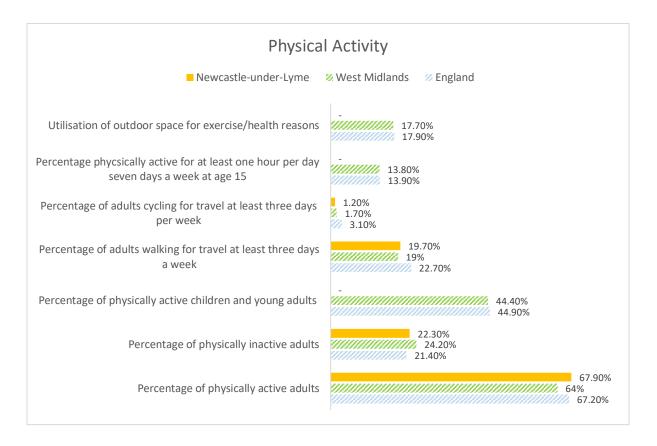


Figure 20 Public Health England, 2020

Figure 20 shows that the percentage of physically active adults in Newcastle-under-Lyme is slightly higher than England and 3.9% higher than the West Midlands, therefore meaning that

22

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/83 2868/uk-chief-medical-officers-physical-activity-guidelines.pdf

the percentage of physically inactive adults is lower in Newcastle-under-Lyme. However, the percentage of adults who walk or cycle for travel at least three days per week is lower in Newcastle-under-Lyme than in the rest of England. The percentage is particularly lower for cycling.

Data for Newcastle-under-Lyme was unavailable for utilisation of outdoor space for exercise/health reasons, percentage physically active for at least one hour per day seven days a week at age 15 and percentage of physically active children and young adults.

Excess weight and obesity

Tackling obesity is one of the greatest long-term health challenges the UK faces. Around two thirds (63%) of adults are above a healthy weight, and of these half are living with obesity. 1 in 3 children leave primary school already overweight, with 1 in 5 living with obesity. Excess weight and obesity is associated with reduced life expectancy. It is a risk factor for a range of chronic diseases, including cardiovascular disease, type 2 diabetes, at least 12 kinds of cancer, liver and respiratory disease, and obesity can impact on mental health²³.

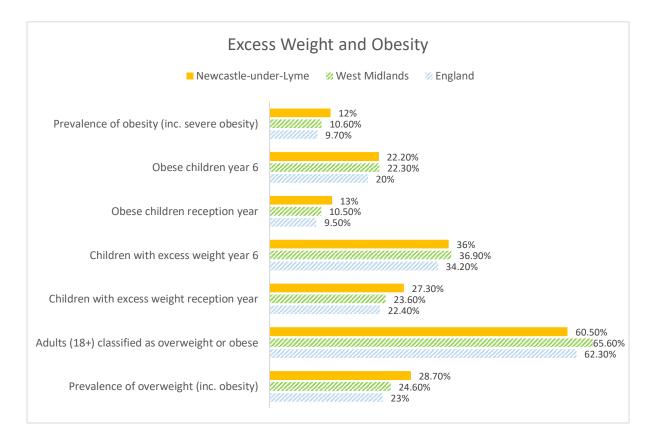


Figure 21 Public Health England, 2020

²³ https://www.gov.uk/government/publications/tackling-obesity-government-strategy/tackling-obesity-empowering-adults-and-children-to-live-healthier-lives

Figure 21 shows that Newcastle-under-Lyme has a larger weight/obesity problem than the West Midlands and England. The prevalence of overweight individuals in Newcastle-under-Lyme is 28.7%, compared to 24.6% in the West Midlands and 23% in England. However, the percentage of adults (18+) who are overweight is below the country average, whilst the percentage of children who are overweight is higher.

Diabetes

Type 2 diabetes can be prevented or delayed by lifestyle changes such as exercise and diet. Complications which occur as a result of having type 2 diabetes include cardiovascular, kidney, foot and eye diseases. These diseased can have a detrimental impact on your quality of life and morbidity.

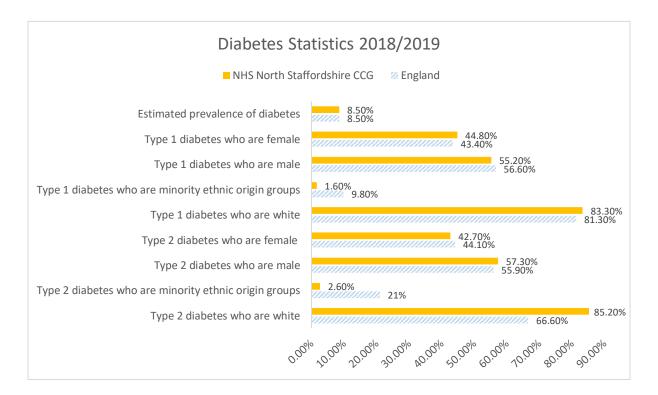


Figure 22 Public Health England

Figures 22 shows that Newcastle-under-Lyme (included in NHS North Staffordshire CCG data) has the same estimated prevalence of diabetes as England. Type 1 diabetes is more common in females compared to the rest of the country, whereas type 2 diabetes is more common in men.

However, Newcastle-under-Lyme has a larger prevalence of diabetes amongst the white community compared to England, and a much smaller prevalence amongst people from minority ethnic origin groups.

Cardiovascular Disease

Cardiovascular disease (CVD) is a general term for conditions affecting the heart or blood vessels. CVD is one of the main causes of death and disability in the UK, but it can often largely be prevented by leading a healthy lifestyle²⁴. The British Heart Foundation estimate that 12% of the population are living with some form of cardiovascular disease, equating to 16,300 people²⁵.

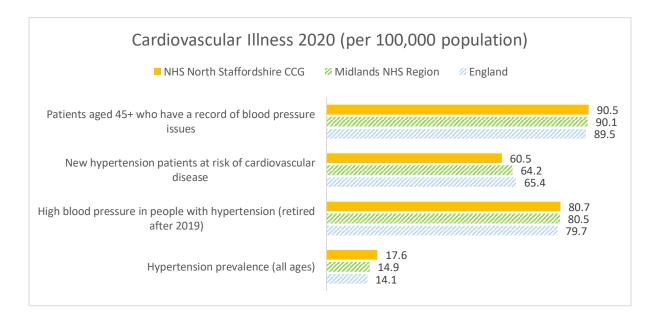


Figure 23 Public Health England, 2020

Figures 23 shows that Newcastle-under-Lyme (included in NHS North Staffordshire CCG data) has a 3.5% higher hypertension prevalence amongst all ages compared to England. However, patients aged 45+ with blood pressure issues and high blood pressure in people with hypertension is in line with the country average. Further, the percentage of new hypertension patients at risk of cardiovascular disease is 4.9% lower in Newcastle-under-Lyme compared to England.

Cancer

Cancer is a condition where cells in a specific part of the body grow and reproduce uncontrollably. These cells can invade and destroy surrounding healthy tissue, including

²⁴ https://www.nhs.uk/conditions/cardiovascular-

disease/#:~:text=Cardiovascular%20disease%20(CVD)%20is%20a,increased%20risk%20of%20bloo d%20clots.

²⁵ https://www.bhf.org.uk/what-we-do/our-research/heart-and-circulatory-diseases-innumbers/incidence-and-prevalence-incidence-by-local-authority

organs. Making simple changes to your lifestyle can significantly reduce your risk of developing cancer. These include healthy eating, taking regular exercise and not smoking²⁶.

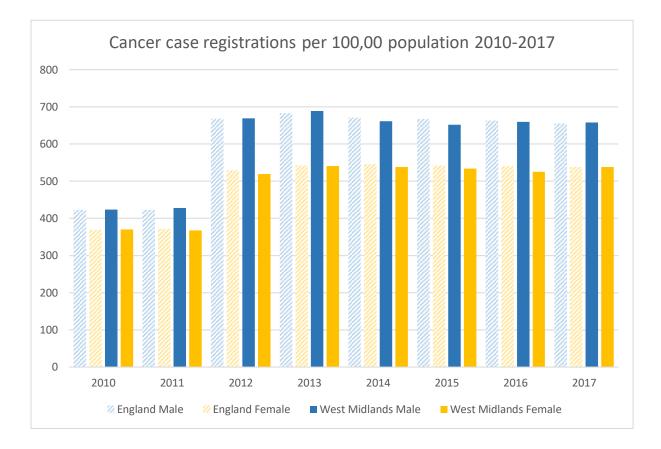


Figure 24 Office of National Statistics

²⁶ https://www.nhs.uk/conditions/cancer/

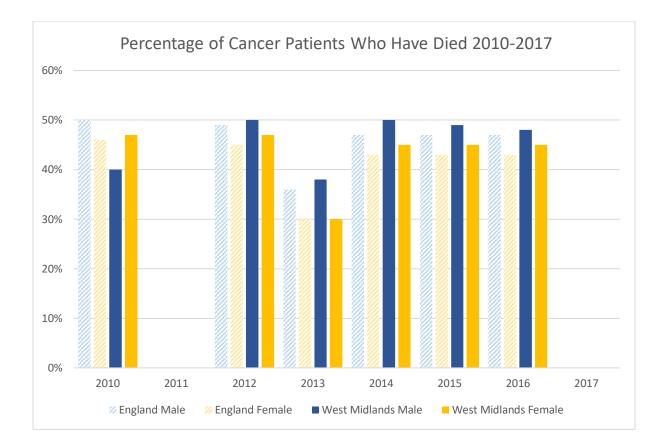


Figure 25 Office of National Statistics

Figure 25 shows that in 2011 and 2017 no data was available from the Office for National Statistics in relation to the percentage of cancer patients who have died. The percentage of patients who have died from cancer is similar across all years besides West Midlands Males in 2010 and all categories in 2013. The difference between male and female deaths in West Midlands follows the same pattern as England.

Mortality attributable to particulate air pollution

In the year ending 2019, the fraction of mortality attributable to particulate air pollution was $5.1\%^{27}$. This is down from 5.6% in 2014. In 2014, Newcastle-under-Lyme's mortality rate attributable to particulate air pollution was $5.2\%^{28}$.

Alcohol related harm

Over time, excessive alcohol use can lead to the development of chronic diseases and other serious problems including high blood pressure, heart disease, stroke, liver disease, digestive problems and many forms of cancer²⁹. Alcohol related harm is estimated to cost the NHS in

²⁷ https://fingertips.phe.org.uk/search/air%20pollution

²⁸ Estimating Local Mortality Burdens associated with Particulate Air Pollution (2014)

²⁹ https://www.cdc.gov/alcohol/fact-sheets/alcohol-

use.htm#:~:text=Over%20time%2C%20excessive%20alcohol%20use,liver%20disease%2C%20and

England £3.5billion every year. Alcohol related admissions to hospital have grown by 17% in the last decade³⁰.

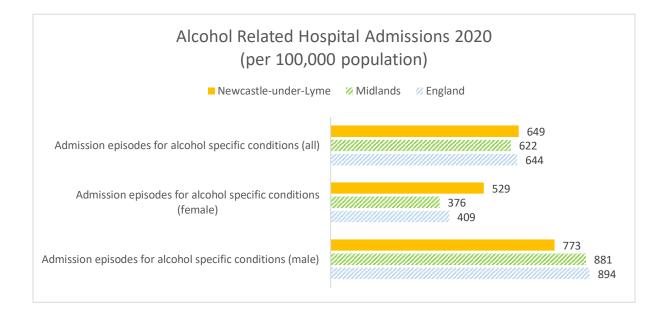


Figure 26 Public Health England, 2020

Figure 26 shows that admission episodes for the entire population for alcohol specific conditions is similar across Newcastle-under-Lyme, the Midlands and England. However, admission rates are higher per 100,000 of the population for females compared to the Midlands and England, and lower for males.

Liver Disease

Liver disease is one of the top causes of death in England. Liver disease can be prevented by maintaining a healthy weight and staying within the recommended alcohol limits³¹.

^{%20}digestive%20problems.&text=Cancer%20of%20the%20breast%2C%20mouth,esophagus%2C% 20liver%2C%20and%20colon.

³⁰ https://www.england.nhs.uk/2019/01/nhs-long-term-plan-will-help-problem-drinkers-and-

smokers/#:~:text=Alcohol%2Drelated%20harm%20is%20estimated,%C2%A33.5%20billion%20every%20year.

³¹ https://www.nhs.uk/conditions/liver-disease/

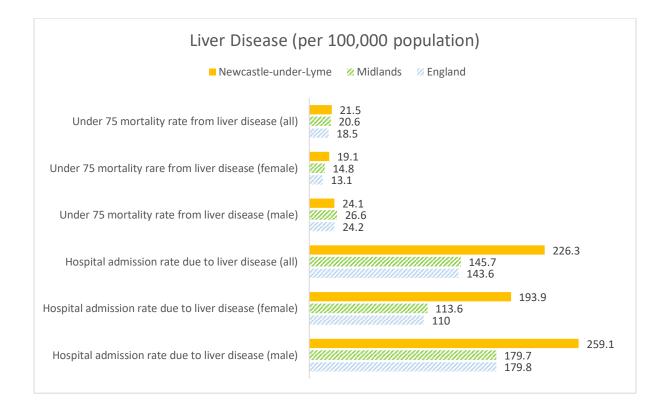


Figure 27 Public Health England, 2020

Figure 27 shows that hospital admission rates due to liver disease are significantly higher per 100,000 of the population in Newcastle-under-Lyme compared to the Midlands and England. This is the case for both males and females. However, whilst slightly higher, the mortality rate in the borough can be considered to be in line with the Midlands and England rates. It should be noted that whilst admission rates for females are significantly higher in Newcastle-under-Lyme than the Midlands and England, mortality rates are lower.

Fuel Poverty

Low temperatures are strongly linked to a range of negative health impacts and excess winter deaths³².

Figure 28 shows that between 2010 and 2018, the percentage of households in Newcastleunder-Lyme who are in fuel poverty has significantly decreased. In 2010, 22% of households in the borough were in fuel poverty, where as 11% are in 2018. The borough saw a large decrease between 2010 and 2011, before a fluctuating decrease between 2011 and 2018.

³² Marmot Review Team. (2011). The Health Impacts of Cold Homes and Fuel Poverty

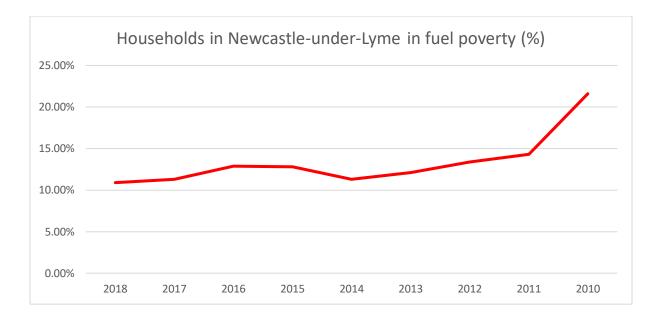


Figure 28 Households in Newcastle-under-Lyme in fuel poverty 2010-2018 (ONS, 2020)

Excess Winter Deaths

The Excess Winter Deaths (EWD) Index provides a ratio of extra deaths from all causes that occur in the winter months compared with the expected number of deaths, based on the average of the number of non-winter deaths.

The EWD Index is estimated by comparing the winter months of December to March with the average of the four-month periods before and after. It must be noted that for winter 2019 to 2020, deaths where coronavirus (covid-19) was mentioned on the death certificate, were excluded from the data. This is in order to improve the comparability of this winter's figures with previous years – as coronavirus is a new disease.

In England, there were an estimated 26,500 excess winter deaths (EWD) in 2019 to 2020, with 50.2% among males (13,300) and 49.4% among females (13,100). The excess winter mortality index in England was statistically significantly higher than for winter 2018 to 2019, but statistically significantly lower than the 2016 to 2017 and 2017 to 2018 winters³³.

³³

https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/ex cesswintermortalityinenglandandwales/2019to2020provisionaland2018to2019final#:~:text=In%20Engl and%2C%20there%20were%20an,%25%20among%20females%20(13%2C100).

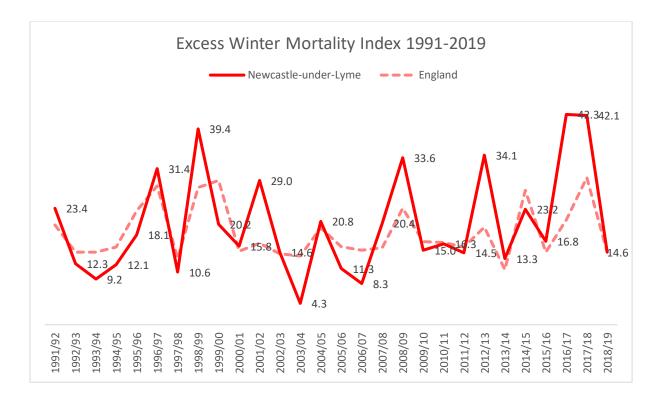


Figure 29 Excess winter Mortality Index 1991-2019 (ONS, 2020)

Figure 29 shows that whilst excess winter mortality rates fluctuate both nationally and in Newcastle-under-Lyme, between 1991 and 2019, there have been several occasions where it has been significantly higher in Newcastle-under-Lyme. For example, 1998, 2001, 2008, 2012, 2016 and 2017. However, it can be noted that in 1993, 2003 and 2006, excess winter mortality was much lower in the borough than across England.

Health Related Quality of Life

More than 1 in 5 of the population are over the age of 60, and the number of people over 60 is set to rise from 14.9million in 2014 to 18.5million in 2025. 75% of 75 years olds in the UK have one or more long term condition, rising to 82% of 85 year olds. Between 2007/08 and 2013/14 the number of A&E attendances by people aged 60 and over increased by two thirds³⁴. With an ageing population, there requires a larger focus on preserving independence and promoting well-being in older people.

³⁴ https://www.england.nhs.uk/ourwork/clinical-policy/older-people/improving-care-for-older-people/

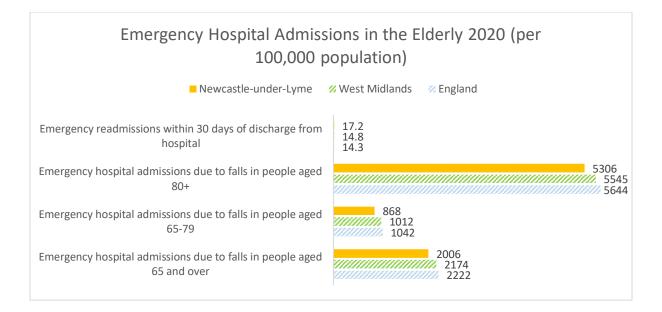


Figure 30 Public Health England, 2020

Figure 30 shows that in Newcastle-under-Lyme, there are fewer emergency hospital admissions in the elderly compared to the West Midlands and England. However, there are higher rates of readmission within 30 days of being discharged in Newcastle-under-Lyme.

Mental Well-Being

In the year 2019/20, NHS England spent £2,851,068 on mental health services in the North Staffordshire area, which includes Newcastle-under-Lyme and the Staffordshire Moorlands District³⁵.

³⁵ https://www.staffordshire.gov.uk/Care-for-all-ages/Information-for-providers/Market-Position-Statements/Mental-health/Market-position-statement-for-mentalhealth.aspx#ThecountyofStaffordshire



Figure 31 Public Health England, 2017

Figure 31 shows that similar percentages of cases of common mental health illnesses are present in Newcastle-under-Lyme, compared to the West Midlands and England.

Emergency Admissions to Hospital Due to Self-Harm

Self-harm is when you hurt yourself as a way of dealing with very difficult feelings, painful memories or overwhelming situations and experiences. Those who self-harm are at a higher risk or suicide. Common reasons for self-harm include:

- pressures at school or work;
- bullying;
- money worries;
- sexual, physical or emotional abuse;
- bereavement;
- homophobia, biphobia and transphobia;
- breakdown of a relationship;
- loss of a job;
- an illness or health problem;
- low self-esteem;

 an increase in stress; difficult feelings, such as depression, anxiety, anger or numbness³⁶.

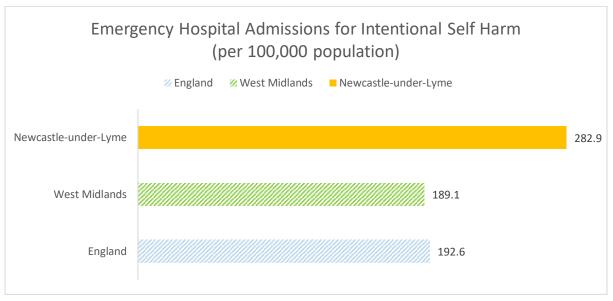




Figure 32 shows that hospital admissions for intentional self-harm is significantly higher in Newcastle-under-Lyme compared to the West Midlands and England. Admissions are 90.3 per 100,000 of the population higher in Newcastle-under-Lyme than in England.

Suicide Rate

Suicide is the act of intentionally taking your own life. Suicidal feelings can mean having abstract thoughts about ending your life or feeling that people would be better off without you. It can mean thinking about methods of suicide or making clear plants to take your own life³⁷.

³⁶ https://www.mind.org.uk/information-support/types-of-mental-health-problems/self-harm/about-self-harm/

³⁷ https://www.mind.org.uk/information-support/types-of-mental-health-problems/suicidal-feelings/about-suicidal-feelings/

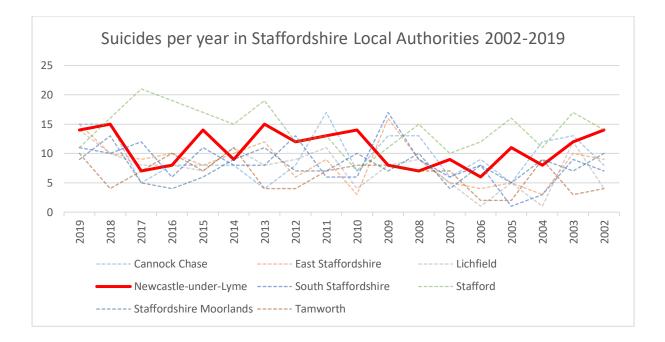


Figure 33 Deaths by suicide per year 2002-2019 in all Staffordshire local authorities (ONS, 2020)

It can be seen by figure 33 that deaths by suicide per year between 2002-2019 have fluctuated significantly amongst all local authorities. However, it must be noted that small increases/decreases appear to show a large fluctuation on figure 33. Therefore it is useful to look at the exponential trend line (blue) on figures 34 and 35 to show an overall change over time.

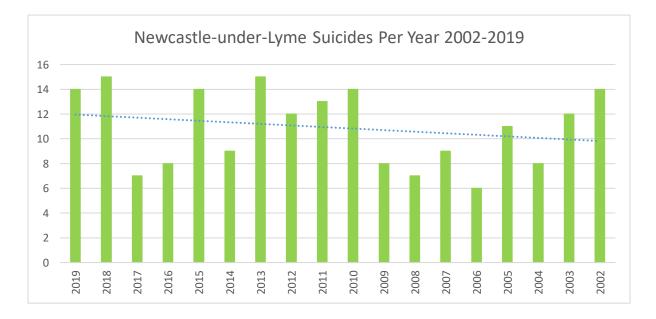


Figure 34 Deaths by suicide per year 2002-2019 (ONS, 2020)

Figure 34 shows that in Newcastle-under-Lyme, deaths by suicide have fluctuated more significantly that Staffordshire as a county. However, it can be seen by the exponential trend line that deaths by suicide have increased from 10 to 12 per year between 2002 and 2019.

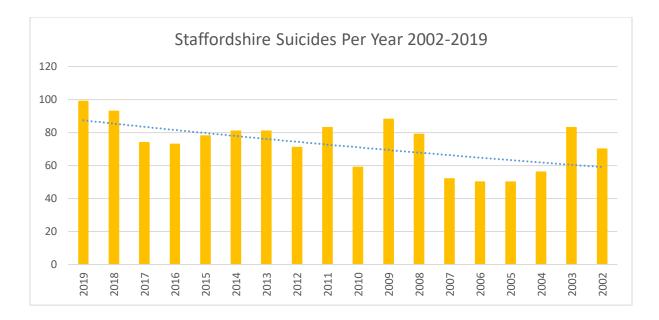


Figure 35 Deaths by suicide per year 2002-2019 in Staffordshire County (ONS, 2019)

Figure 35 shows that in Staffordshire, whilst fluctuating, there has been a general increase in suicides per year between 2002 and 2019. The number of deaths by suicide in 2019 is the highest recorded number thus far and is double the lowest recorded years in 2006 and 2007. The general increase, as seen by the exponential trend line (blue) has increased from 60 to 90 deaths by suicide per year.

Noise Complaints

The Noise Policy Statement for England was adopted in 2010. It sets out the long term vision of the government for noise policy, to promote good health and a good quality of life through the management of noise in the context of Government policy on sustainable development. The policy aims to:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life;
- where possible, contribute to the improvement of health and quality of life³⁸.

³⁸ Noise Policy Statement for England (NPSE) (Defra, 2010)

Housing

Joint Housing Needs Assessment (2020)

Turley, in partnership with Edge Analytics, were commissioned by Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council to produce a new Housing Needs Assessment to form part of the evidence base for the emerging Local Plan.

The Housing Needs Assessment (2020) was produced to replace the Strategic Housing Market Assessment 2017 (SHMA), which in turn replaced the original SHMA from 2015.

The updated assessment was produced in the context of a revised National Planning Policy Framework (NPPS) which was published in 2018 and updated in 2019.

The Housing Needs Assessment (2020) suggests the following:

355 dwellings per annum are needed in Newcastle-under-Lyme using standard methodology;

- A larger need for 2,3 and 4 bed dwellings;
- 75% of new dwellings should be houses, 15% flats and 10% bungalows;
- A net need for 28 affordable homes per annum;
- 1 in 5 residents are limited in their daily activities, which must be taken in to account when establishing policies on new housing provision;
- An increase in employment roles projected in the ENA are typically filled by people renting properties;
- An increasing need for student accommodation, which is not explicitly taken in to account, as a result of Keele University's long-term ambition to double its student population over the next 40 years;
- Actively monitor the adequacy and number of plots available for self-builders.

Number of Houses

Since 2015, 1,066 additional homes have been added to the housing stock of Newcastleunder-Lyme. This is estimated to have grown the housing stock by circa 1.9%. This is slower rates than 3.5% in the West Midlands and 3.7% in England over the same time period³⁹.

Vacancy Rates

³⁹ Housing Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent (Turley, 2020)

Overall vacancy rates in Newcastle-under-Lyme were 2.1% in 2020, compared to 2.7% in England.

	Total properties	Number of vacant properties	Change between 2019 and 2020	Change since 2010	Vacant LA owned properties	Overall vacancy rate
Newcastle- under-Lyme	56,707	1197	+46	-661	0%	2.1%

Table 16 Council Tax Base, 2020

Average house prices, average monthly private rental and affordability ratio

The average house price in Newcastle-under-Lyme in 2019 is £166,362, compared to the England average of £301,219. The average monthly private rental in Newcastle-under-Lyme is £522.50.

The affordability ratio (lower quartile income vs lower quartile house prices 2020) is 6.18x income in Newcastle-under-Lyme. This is compared to the England figure of 7.9x income⁴⁰.

Household Tenure

	Local Authority (incl. owned by other LAs)	Private Registered Provider	Other Public Sector	Private Sector	Total
Newcastle- under-Lyme	4	9873	0	46,830	56,707

Table 17 Office for National Statistics, 2020

Social Inclusiveness and Deprivation

Indices of Deprivation

The English Indices of Deprivation 2019 were published on 26th September 2019 and were an update to the English indices of deprivation 2015. They are produced using a series of 'domains'. These include income, employment, health deprivation and disability, education, skills training, crime, living environment and barriers to housing and services⁴¹.

⁴⁰ Housing Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent (Turley, 2020)

⁴¹ The English Indices of Deprivation 2019 – Statistical Release Main Findings

Table 18 shows all areas within Newcastle-under-Lyme and their IMD rank and decile. A LSOA with a rank of 1 is the most deprived and the LSOA with a rank of 32,844 (total in the country) is the least deprived.

The deciles are calculated by ranking the 32,844 LSOAs in England from most deprived to least deprived and dividing them into 10 equal groups. LSOAs in decile 1 fall within the most deprived 10% of LSOAs nationally, and LSOAs in decile 10 fall within the least deprived 10% nationally.

LSOAs (lower-layer super output areas) are small areas designed to be of a similar population size, with an average of approximately 1500 residents or 650 households.

LSOA Name	Index of Multiple Deprivation (IMD) Rank	Index of Multiple Deprivation (IMD) Decile
Newcastle-under-Lyme 005A	18,854	6
Newcastle-under-Lyme 005B	22,320	7
Newcastle-under-Lyme 005C	24,097	8
Newcastle-under-Lyme 005D	10,190	4
Newcastle-under-Lyme 004A	28,338	9
Newcastle-under-Lyme 006A	11,910	4
Newcastle-under-Lyme 006B	8,469	3
Newcastle-under-Lyme 006C	18,776	6
Newcastle-under-Lyme 003A	15,662	5
Newcastle-under-Lyme 003B	10,672	4
Newcastle-under-Lyme 003C	13,643	5
Newcastle-under-Lyme 003D	5,190	2
Newcastle-under-Lyme 004B	23,038	8
Newcastle-under-Lyme 004C	20,800	7
Newcastle-under-Lyme 004D	27,107	9
Newcastle-under-Lyme 007A	5,185	2
Newcastle-under-Lyme 007B	3,389	2
Newcastle-under-Lyme 014A	8,706	3
Newcastle-under-Lyme 014B	26,923	9
Newcastle-under-Lyme 006D	11,639	4
Newcastle-under-Lyme 010A	7,441	3
Newcastle-under-Lyme 010B	1,747	1
Newcastle-under-Lyme 011A	10,756	4
Newcastle-under-Lyme 005E	18,409	6
Newcastle-under-Lyme 013A	28,379	9
Newcastle-under-Lyme 006E	7,249	3
Newcastle-under-Lyme 007C	13,431	5
Newcastle-under-Lyme 007D	5,263	2
Newcastle-under-Lyme 002A	8,921	3

22,026 19,415	7
19,415	
,	6
4,083	2
28,927	9
2,638	1
12,329	4
7,067	3
17,385	6
25,592	8
18,331	6
30,493	10
29,366	9
20,189	7
11,971	4
31,784	10
24,167	8
11,877	4
	8
	7
	7
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	28,927 2,638 12,329 7,067 17,385 25,592 18,331 30,493 29,366 20,189 11,971 31,784 24,167

Newcastle-under-Lyme 014F	14,106	5
Newcastle-under-Lyme 015G	28,153	9
Newcastle-under-Lyme 008D	19,180	6
Newcastle-under-Lyme 009D	21,189	7
Newcastle-under-Lyme 008E	13,996	5
Newcastle-under-Lyme 009E	23,127	8
Average	16,926	6

Table 28 Index of Multiple Deprivation (IMD) 2019

Index of Multiple Deprivation	Number of LSOAs in	Total in upper and lower
(IMD) Decile	Newcastle-under-Lyme in	decile groups
	Decile	
1	2	37
2	7	
3	10	
4	12	
5	6	
6	11	42
7	10	
8	7	
9	10	
10	4	

Table 19 Index of Multiple Deprivation (IMD) Newcastle-under-Lyme Deciles 2019

In total, there are 79 LSOAs in Newcastle-under-Lyme. The 2019 IMD gives the borough an average rank of 16,926 and average decile of 6. The above tables places 37 LSOAs in the bottom 5 deciles and 42 in the top 5 deciles. There are 2 LSOAs in Newcastle-under-Lyme in the most deprived 10% of LSOAs nationally.

Community and Safety

Police Recorded Violent Crime

The Health and Social Care Act was published in 2012 and provides the most extensive reorganisation of the structure of the NHS in England to date. As a result of this act, directors of Public Health in local authorities have "become responsible for the public health aspects of the promotion of community safety, violence prevention, responses to violence, and local initiatives to tackle social exclusion"⁴².

England	West Midlands	Staffordshire
---------	---------------	---------------

⁴² https://www.gov.uk/government/publications/health-and-social-care-act-2012-fact-sheets

Offences involving a knife	+7%	+6%	+5%
Violence against a	+5%	+14%	+5%
person			
Homicide	+10%	+28%	-
Violence with injury	-5%	-3%	-15%
Violence without	+3%	+15%	+10%
injury			
Stalking and	+18%	+34%	+18%
harassment			
Death or serious	-4%	-41%	-
injury by unlawful			
driving			
Sexual offences	-6%	-4%	-1-%
Robbery	-17%	-21%	-30%
Theft offences	-20%	-22%	-19%
Burglary	-20%	-23%	-18%
Residential burglary	-19%	-23%	-16%
Non-residential	-25%	-24%	-22%
burglary			
Vehicle offences	-16%	-17%	-1%
Theft from person	-29%	-29%	-31%
Bicycle theft	-13%	-18%	-9%
Shoplifting	-23%	-28%	-33%
All other theft	-23%	-21%	-17%
offences			
Criminal damage	-8%	-15%	-2%
and arson			
Drug offences	+16%	+7%	-9%
Possession of	-1%	+1%	-15%
weapons			
Public order	+7%	+24%	+12%
offences			
Miscellaneous	+3%	+5%	-15%
crimes against			
society			
Total	-6%	-5%	-6%

Table 20 Police Force Area data Office for National Statistics 202143

Table 20 shows that Newcastle-under-Lyme, included in the data for Staffordshire, has seen a 1% further decrease in crime between 2019 and 2020 compared to the West Midlands, and is parallel with the average decrease seen across England, -6%. Further, England as a nation has seen 8 areas where crime has increased, compared to 9 in the Midlands and 5 in

⁴³

https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/policeforceareadatatatables

Staffordshire. Areas of crime which have increased in Staffordshire and Newcastle-under-Lyme are violence involving a knife, violence against a person, violence without injury, stalking and harassment and public order offences.

Economic

Material Assets

Table 21 shows that the gross annual median wage in Newcastle-under-Lyme is lower than both the West Midlands and England. However, whilst slightly below the national and West Midland average for change between 2009 and 2019, it can be said that Newcastle-under-Lyme is in line with the national increase in wages, increasing by 16% whilst England increased by 17% within the same time frame⁴⁴.

	2009	2019	Change
Newcastle-under-Lyme	£20,901	£24,270	+16%
West Midlands	£23,958	£28,536	+19%
England	£26,133	£30,667	+17%

Table 31 Change in workplace gross annual median wages 2009-2019 (Turley, 2020)

In 2020, the median gross weekly pay in the UK was £585.50, up by 0.1% on 2019. This is an increase of £0.30 a week against 2019. This median gross weekly pay equates to a median hourly pay of £15.07 for full time workers, excluding overtime⁴⁵.

In Newcastle-under-Lyme, the median gross weekly pay was £535.10 in 2020, up by 3.3% on 2019. This is an increase of £17.90 a week against 2019. This median grow weekly pay equates to a median hourly pay of £13.86 for full time workers, excluding overtime⁴⁶. Therefore, whilst below the UK average for weekly and hourly pay, Newcastle-under-Lyme has seen a much larger percentile increase in weekly earnings since 2019 compared to the rest of the UK.

Home Ownership

Home ownership is higher in Newcastle-under-Lyme than the average for England.

Owned	Owned	Shared	Social	Private	Private	Living
Outright	with a	ownership	Rented	Rented	Rented	Rent
	mortgage			from	Other	Free
	or loan			landlord		

⁴⁴ Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent Turley, 2020

⁴⁵ https://www.nomisweb.co.uk/datasets/asher

⁴⁶ https://www.nomisweb.co.uk/datasets/asher

Newcastle-	35.2%	33.9%	0.4%	18.7%	9.4%	1.1%	1.3%
under-							
Lyme							
England	30.6%	32.8%	0.8%	17.7%	15.4%	1.4%	1.3%

Table 22 Census 2011

Economic Activity

Economic activity relates to whether or not an adult (aged 16 and over) was working or looking for work at the time of the survey, thus illustrating the extent to which they are actively participating in the labour market.

	2009	2019	Change
Newcastle-under-Lyme	63%	62%	-1%
Stok-on-Trent	60%	59%	-1%

Table 23 Economic activity rates 2009-2019 (Turley, 2020)

Economic Activity	Newcastle-under-
	Lyme
Economically Active: In Employment	54,599
Economically Active: Student (including full-time students)	3,591
Economically Inactive: Looking after home/ family/retired	17,813
Economically Inactive: Permanently sick/ disabled	4,341
Economically Inactive: Unemployed	3,378

Table 24 Economic activity - all people (Census 2011)

	Newcastle-	Newcastle-	West Midlands	Great Britain					
	under-Lyme	under-Lyme %	%	%					
All People									
Economically	63,800	75.8%	77.9%	79.0%					
active									
In employment	56,700	67.1%	73.7%	75.7%					
Employees	50,900	60.1%	64.2%	65.1%					
Self employed	5,800	7.1%	9.4%	10.3%					
Unemployed	2,000	3.1%	5.2%	4.2%					
Males									
Economically	36,100	78.9%	82.3%	82.9%					
active									
In employment	32,000	69.5%	77.4%	79.1%					

Employees	28,500	61.7%	64.5%	65.5%
Self employed	*	*	12.8%	13.4%
Unemployed	*	*	5.7%	4.5%
Females		-	•	
Economically	27,700	72.2%	73.4%	75.2%
active				
In employment	24,700	64.4%	70.0%	72.2%
Employees	22,300	58.2%	63.8%	64.6%
Self employed	*	*	6.1%	7.3%
Unemployed	*	*	4.6%	3.8%

Table 25 Employment and unemployment (ONS 2020)* sample size too small for reliable estimate

	Newcastle-	Newcastle-	West Midlands	Great Britain
	under-Lyme	under-Lyme %	%	%
Total	19,800	24.2%	22.15	21.0%
Student	7,200	36.5%	27.9%	26.9%
Looking after	*	*	23.0%	20.8%
family/home				
Temporarily	!	!	1.9%	1.9%
sick				
Long-term sick	*	*	24.1%	23.8%
Discouraged	!	!	0.5%	0.55
Retired	!	!	13.0%	13.5%
Sick	*	*	9.5%	12.7%

 Table 26 Economic inactivity (ONS 2020)

 * sample size too small for reliable estimate

 ! estimate is not available since sample size is disclosive

Economic Activity	Newcastle-under-
	Lyme
All people aged 16-74 in employment	57,366
Manufacturing (C)	12.5%
Construction (F)	8.1%
Wholesale and retail trade; repair of motor vehicles and motor	18.9%
cycles (G)	
Public administration and defence compulsory social security,	29.1%
education, human health and social work activities (O, P, Q)	

Table 27 Industry of employment (selected groups) - All people aged 16-74 in employment (Census 2011)

Economically Active	Newcastle-under-	West	Great
	Lyme	Midlands	Britain
Managers, directors and senior	11.4%	10.7%	11.5%
officials			
Professional occupations	21.9%	21.2%	22.3%
Associate professional &	12.2%	13.7%	15.2%
technical			
Administrative & secretarial	*	10.2%	9.9%
Skilled trades occupations	11.8%	10.2%	9.5%
Caring, leisure and other service	11.5%	9.2%	9.0%
occupations			
Sales and customer service	*	6.4%	6.9%
occupations			
Process; plant and machine	*	6.5%	5.6%
operatives			
Elementary occupations	*	11.8%	9.7%

Table 28 Occupation groups (ONS 2020)

% is a proportion of all persons in employment

* sample size too small for reliable estimate

	Newcastle-under-	Newcastle-under-	Great Britain	
	Lyme (jobs)	Lyme (density)	(density)	
Job density	49,000	0.60	0.87	

Table 29 Labour demand - jobs density 2019 (Nomis)

Local Economy

The local economy in Newcastle-under-Lyme has not grown at the same rate as neighbouring boroughs. Between 2009 and 2018, 183 jobs were created in the borough. This is substantially lower than Stoke-on-Trent where 14,489 were created within the same time period. The change experienced in Newcastle-under-Lyme is 1.3% lower than Stoke-on-Trent and 1.1% than England.

Employment in Newcastle-under-Lyme has been stable, but has recovered from a decline that followed the last recession with more jobs in each of the last five years than were recorded in 2009. Therefore, while the borough is implied to have created only 20 jobs per annum since 2009, this average rises to 177 jobs per year – or 0.2% growth per annum – when calculated over the past five years (2013-18).

Further, the amount of business units in Newcastle-under-Lyme grew by 13% between 2010 and 2019. This is significantly lower than 20% in the West Midlands and 25% nationally⁴⁷.

	Newc	astle-under	-Lyme	Stoke-on-Trent		
	2009	2019	Change	2009	2019	Change
No qualifications	14%	7%	-7%	18%	13%	-5%
Other qualifications	5%	5%	0%	9%	7%	-2%
NVQ1+	81%	89%	+8%	73%	81%	+8%
NVQ2+	67%	78%	+11%	56%	67%	+11%
NVQ3+	45%	51%	+6%	36%	46%	+10%
NVQ4+	23%	30%	+7%	18%	25%	+7%

Education

Table 30 Highest level of qualification 2009-2019 (Turley, 2020)

Keele University

Keele University is a major employer with over 2,000 staff, equivalent to 1,750 full-time equivalent

(FTE) jobs (2018). This makes the University one of the largest employers in the area, alongside the NHS and local government.

The University is a key facilitator of job creation for the Borough and wider region. The existing Science and Innovation Park currently provides some 600 jobs across some 50 companies (July 2020). These range in size and status from start-up companies to satellite premises of multi-national organisations. All are knowledge-based enterprises.

The University has developed a 2040 Vision for expansion to allow for an additional 1,500 students every 5 years.

Transport

The efficient and reliable movement of people and good to, from, through and within Newcastle-under-Lyme is essential to maintaining the area's reputation as a competitive and liveable region.

Transport is an enabler of economic activity; it can improve productivity, support extensive labour markets and allow businesses to benefit from agglomeration. However, it left unmanaged, it can hamper economic activity and sustainable development. The Confederation of British Industry estimates that congestion costs the UK economy £20bn a

⁴⁷ Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent (Turley, 2020)

year and Stafford Chamber of Commerce states that traffic congestions in the region costs each business around £20,000 a year.

The Staffordshire Local Transport Plan was adopted in 2011 and sets out the county transport plan to 2026. It incorporates Newcastle-under-Lyme and sets out the County Council's proposals for transport provision in the county, including walking, cycling, public transport, car based travel and freight, together with the management and maintenance of local roads and footways⁴⁸.

Material Assets

Table 31 shows the percentage of roads in Staffordshire, the West Midlands and England where maintenance needs to be considered. Data for Newcastle-under-Lyme is incorporated into the data for Staffordshire.

	Principal (LA maintained 'A' roads and motorways)								
	2010/	2011/	2012/	2013/	2014/	2015/	2016/	2017/	2018/
	11	12	13	14	15	16	17	18	19
Staffords	4	4	3	2	2	2	3	3	3
hire									
West	6	5	5	4	4	4	4	3	3
Midlands									
England	5	5	5	4	4	3	3	3	3
		Non-pri	ncipal (L	A mainta	ined 'B' a	and 'C' ro	ads)		
Staffords	11	14	10	9	9	6	8	8	8
hire									
West	9	10	9	8	7	6	7	6	7
Midlands									
England	10	10	9	8	7	6	6	6	6
			Ur	nclassifie	d Roads				
Staffords	-	16	14	12	12	11	11	11	12
hire									
West	16	17	17	16	17	16	16	17	15
Midlands									
England	16	17	18	18	18	16	17	16	16

Table 31 Percentage of roads where maintenance needs to be considered (Department for Transport, 2019)

Table 32 shows roads which are maintained by local authorities categorised depending on their need for maintenance. The categories mean:

Green - no further investigation needed;

Amber – may need work soon;

⁴⁸ Staffordshire Local Transport Plan 2011

Red – further investigation needed to determine whether maintenance work is needed immediately.

It can be seen that Newcastle-under-Lyme (incorporated within the data for Staffordshire) is in line with the data for the West Midlands and England.

LA maintained roads							
	2017/18					2018/19	
	Green	Amber	Red		Green	Amber	Red
Staffordshire	74	24	3		73	25	3
West Midlands	70	26	4		71	26	3
England	74	23	3		74	23	3

Table 32 Department for Transport, 2019

Road Congestion

Table 33 shows the average levels of congestion on major roads in Newcastle-under-Lyme. The figures given are the average delay in seconds, per vehicle per mile. It must be remembered that the statistics given for 2020 were during the Coronavirus Covid-19 pandemic, and therefore are significantly lower than the 2017-2019 data, due to restrictions on movement being in place.

	2017	2018	2019	2020	Change
A50	12.2	13.3	11.8	8.0	-30.9%
A500	16.7	16.3	18.1	10.0	-40%
M6	7.9	8.5	7.1	4.2	-40%

Table 33 Traffic congestion on major roads in Newcastle-under-Lyme (Department for Transport, 2020)

Car Ownership

49

	Total
All categories: car or van availability	52,574
No cars or vans in household	11,632
1 car or van in household	22,475
2 cars or vans in household	14,283
3 cars or vans in household	3,178
4 or more cars or vans in household	1,006
Sum of all cars or vans in the area	65,011

Table 34 Car ownership in Newcastle-under-Lyme (Census, 2011)⁴⁹

https://www.nomisweb.co.uk/census/2011/QS416EW/view/1946157176?rows=cell&cols=rural_urban

Bus Patronage

Over 20 million bus passenger journeys are made in Staffordshire each year of which over 3 million are in the Newcastle urban area⁵⁰.

Two thirds of residents live within 350m of a bus stop with a half-hourly service between 8am and 6pm Monday to Friday. However, there are still residents who struggle with access to services. Accessible public transport is key to sustainable development in the borough.

Public satisfaction levels with travel information in Staffordshire is low at 38%, placing the county ninth out of the county's ten nearest neighbours⁵¹.

Rail Patronage

The county's geographical location aids its connection to the national rail network. The West Coast Mainline runs north to south, providing connections to major cities such as Liverpool, Manchester, Birmingham and London.

Kidsgrove Rail Station building is an example of a late 1960's early 1970's station design which rationalised the facilities for customers. Station footfall has increased enormously over the past decade, registering 235,000 entries and exits in 2018/19, up from 141,000 in 2010/11. This is an increase of 67% and is significantly higher than the average growth for both Staffordshire (47%) and the UK (43%). Growth in usage has been driven by the introduction of direct and improved links to Manchester, Stoke, Birmingham and London in addition to a much-improved performance of trains on the North Staffordshire Line between Crewe and Derby. As a result, the Station no longer meets the standards expected by passengers and does not compare favourably to other local stations. The plans for a new station building will ensure that it meets the needs of passengers and the local community together with any future service enhancements and in the longer term plan for a HS2 Hub at Crewe. The HS2 hub at Crewe will transform rail services in South Cheshire and North Staffordshire by offering two HS2 services to London per hour, with a journey time of just 55 minutes.

Satisfaction Levels

Whilst no data is available for Newcastle-under-Lyme as an individual borough, data for the county of Staffordshire is available from the 2020 National Highways & Transport Network Survey.

	2020	UK Average	Difference
Overall satisfaction	48%	52%	-4%

⁵⁰ Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Joint Local Plan Issues Consultation Transport Technical Paper

⁵¹ Staffordshire County Council Local Transport Plan 2011

Accessibility (all)	77%	77%	0%
Accessibility (disabled)	69%	66%	+3%
Accessibility (no car)	67%	70%	-3%
Public Transport	56%	60%	-4%
Cycle routes & facilities	44%	49%	-5%
Pavements & footpaths	55%	55%	0%
Tackling Congestion	48%	46%	2%
Road Safety	57%	57%	0%
Highway Maintenance	45%	50%	-5%
Communication	43%	48%	-5%

Figure 36 National Highway & Transport Network 2020

Whilst this data does not provide a picture of the situation in Newcastle-under-Lyme, it does provide data for the county as a while which can be used as a benchmark for areas of improvement.

Travel to Work

The 2020 Office for National Statistics Travel to Work Methods data shows that the main form of transport used to travel to work is the private car. In figure 37, this method can be seen dominating all industries. A very small amount of people chose to travel by bus or rail, bicycle or by foot.

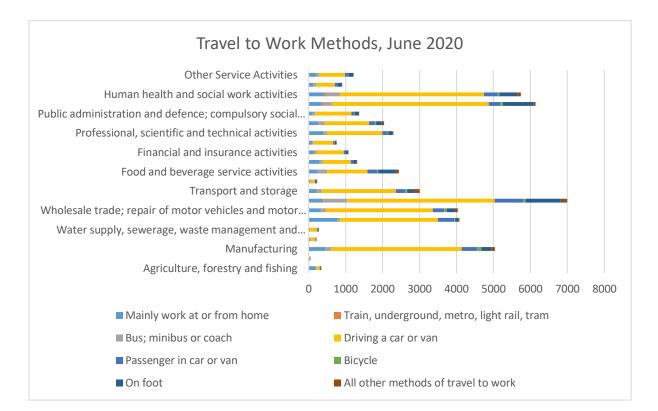


Figure 37 ONS

Traffic Incidents

Worldwide every year the lives of approximately 1.35 million people are cut short due to a fatal road traffic collision. Between 20 and 50 million people suffer non-fatal injuries and many incur disabilities as a result of their injuries. Road traffic injuries cause considerable economic losses to individuals, their families and nations as a whole. These losses arise from the cost of treatment as well as lost productivity for those killed or disabled by their injuries, and for family members who need to take time off work or school to care for the injured. Road traffic crashes cost most countries 3% of their gross domestic product⁵².

Road traffic collisions are a major cause of preventable deaths, particularly in younger age brackets. These deaths are avoidable by raised awareness of risk and improvements to road infrastructure.

	England	West Midlands	Staffordshire
Pedestrian	351	329	149
Pedal cyclist	283	172	101
Motorcyclist	268	148	143
Car occupant	1437	1450	1004
Bus or coach occupant	50	28	17
Van/light goods occupant	65	62	48
HGV occupant	13	15	23
Other vehicle occupant	16	16	15
All casualties	2483	2220	1500

Table 4 Casualty rate per million population (gov.uk, 2020)

Table 34 shows that Newcastle-under-Lyme, included in data for Staffordshire, is below the casualty rate per one million of the population in all accident categories besides HGV occupant. It can also be seen that West Midlands as a region is below the England average rate for all categories besides car occupant and HGV occupant, and in line with other vehicle occupant.

Cycling and Walking

The Government invited all local transport authorities to publish Local Cycling and Walking Infrastructure Plans (LCWIPs) to help deliver their Cycling and Walking Investment Strategy (CWIS). Staffordshire County Council published theirs in February 2020 and this encompasses plans for Newcastle-under-Lyme.

It has been recognised that Newcastle-under-Lyme is the lowest performing in the county for walking zones. This is because of the inclusion of the ring road in the study. Further, it has

⁵² https://www.who.int/news-room/fact-sheets/detail/road-traffic-injuries

been noted that Newcastle-under-Lyme's priority cycle network will be the most challenging to improve in the county as large sections are on heavy trafficked A roads.

It is considered that in order for Staffordshire County Council to help the government achieve its ambition of 'Better Safety, Better Mobility and Better Streets', £31m of investment is required up to 2030. This will include cycle networks and core walking zones in Newcastle-under-Lyme⁵³.

Sustainability Appraisal Objectives

Previous SA Objectives

Below are the SA objectives that have been previously used by Newcastle-under-Lyme Borough Council. These objectives were produced to assess the Joint Local Plan between Newcastle-under-Lyme and Stoke-on-Trent. As a result of the two councils deciding to produce Local Plans independent of each other, it has been decided that the below objectives should be updated.

1	To contribute to carbon reduction and adapt to a changing climate, including
	increasing the use of renewable energy and energy efficiency in existing, new
	development and redevelopment
2	To improve air quality, creating cleaner and healthier air
3	To ensure that there is an overall net gain in the extent and quality of biodiversity
4	To reduce contamination, regenerate degraded environments, re-use materials, and
	maintain soil, geological and land resources
5	To reduce the amount of development within locations at risk of flooding and promote
	the use of sustainable drainage systems
6	To increase the efficient use of water resources, improve water quality and meet the
	requirements of the Water Framework Directive
7	To conserve, enhance and promote interest in local distinctiveness, the historic
	environment, heritage, cultural assets and their settings
8	To strengthen the quality of the landscape and city townscape including historic
	landscape character in urban and rural areas, and deliver well designed development
	which respects local character and distinctiveness
9	To ensure the efficient use of mineral resources, including the recycling and reuse of
	existing materials where possible in order to limit the use of primary aggregates and
	to safeguard their supply

⁵³ Staffordshire County Council Local Cycling and Walking Infrastructure Plan 2020-2030 (February, 2020)

10	Maintain and enhance quality and accessibility of green space
11	Encourage schemes that contribute to self-sufficiency in waste treatment and
	encourage local communities to take responsibility for the waste that they generate
12	To provide housing choice and help meet the housing needs of the whole community
13	To increase life expectancy and improve the health and mental well-being of the
	population overall
14	To provide a more equitable society where the provision of the widest possible range
	of community, cultural, educational, health, recreational and leisure facilities, and
	access to public transport are available to all sectors of the population with particular
	emphasis on deprived neighbourhoods
15	Reduce crime and the fear of crime
16	To reduce the need to travel while increasing transport choice and accessibility for all
17	To enable access to the widest range possible of shopping and commercial services
	for the resident population
18	To provide a range of employment land and premises that meets the needs of the
	business community and tackles socio- economic inequalities within the population
19	To protect and enhance the vitality and viability of the city, town and district centres
	within the urban areas and village centres in the rural area
20	To provide a safe, efficient transport network and increase the use of public
	transport, cycling and walking.
i	

Amendments to SA Objectives

The previous SA objectives have been reviewed and updated to take in to account the updated baseline data and plans and programmes, as well as the move from a Joint Local Plan to an independent Local Plan for the borough.

Consultation on the draft SA Scoping Report took place with the Environmental Agency, Historic England and Natural England, as well as with Staffordshire County Council in May 2021. Following the comments received from these consultation bodies, the SA objectives and indicators were revised in order to produce the final SA Scoping Report.

Changes arising from the update to the baseline data

The below changes were observed in the baseline data, and were used to determine the changes needed to the sustainability appraisal scoping report objectives. If the changes in data are already covered by an existing objective, it is noted below. If they are not, the relevant updated objective number and text have been presented.

Changes observed	Addressed	Updated	Updated objective
	by	objective	
	existing	number	
	objective		
A need for higher	18		
paid jobs			
A need to improve	16, 20		
public transport			
provision and			
satisfaction levels			
An increase in listed	7, 8		
buildings			
An increase in local	7, 8		
listings			
Housing for first time	12		
buyers/help to			
buy/affordable			
housing			
The post Covid-19		19	To protect and enhance the vitality and
high street			viability of the strategic, town, district and
			rural centres within the urban and village
			areas
Increase in mental	13		
health cases and			
suicides			
High cases of	13		
diabetes and			
cardiovascular			
diseases			
Decrease in female	13		
life expectancy			
Increase in	13		
childhood obesity			
Highest excess	13		
winter death			

between 2016-18		
since 1990		

Changes arising to the objectives from the consultation with statutory organisations

The detailed comments from consultees along with a response from the Borough Council officers, and reasons for any change is provided in Appendix A.

Original Objective	Revised Objective
1. To contribute to carbon reduction and adapt to	1. To contribute to carbon the reduction of
a changing climate, including increasing the use	greenhouse gases and adapt to a changing
of renewable energy and energy efficiency in	climate, including increasing the use of
existing, new development and redevelopment.	renewable energy and energy efficiency in
	existing, new development and redevelopment.
10. Maintain and enhance quality and	10. Maintain and enhance the quality, and
accessibility of green space.	accessibility <u>and connectivity</u> of green <u>open</u>
	space and blue and green infrastructure.

New SA Objectives

The SA objectives and baseline data have been structured in a way that is considered to clearly reflect the principles of sustainability set out in the NPPF, which seeks to achieve a balance of the social, economic and environmental aspects of planning.

These new objectives will be used to undertake the sustainability appraisals for each stage of the new Local Plan preparation process, as well as for other planning policy documents such as Supplementary Planning Documents (SPDs).

The SA assessment at each stage of the Local Plan preparation process will be undertaken by the SA team of officers from Newcastle-under-Lyme Borough Council.

The below table (Table 35) outlines the new Sustainability Appraisal Scoping Report Objectives which will be used when assessing future plans and policies. The table shows which NPPF theme the objective addresses and outlines questions which will aid the assessment of proposals and policies.

New Objective	NPPF Theme	Decision aiding questions:	
		Will the option	
1. To contribute to the reduction of greenhouse gases and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment	Social – this objective will help to improve the overall quality of life and health of the community and future generations. Environmental – this objective will help to mitigate climate change.	 Help to reduce emissions? Help to reduce the need for energy use? Help facilitate and encourage the use of renewable energy? Aid the council's plan to adapt to climate change? 	
2. To improve air quality, creating cleaner and healthier air	Social – improvements in air, noise and light pollution will help to support the health of the community. Environmental – help to mitigate climate change whilst improving biodiversity.	 Reduce air, noise and light pollution? Help to improve air quality? Reduce pollution from traffic and public transport? Reduce emissions from buildings? 	
3. To ensure that there is an overall net gain in the extent and quality of biodiversity	Social – this objective will support the community's health and mental wellbeing. Environmental – to conserve and enhance biodiversity in the borough.	 Mitigate the effects of climate change on biodiversity? Defend and enhance endangered/protected species? Protect and enhance designated biodiversity and conservation areas? Ensure new developments will not negatively impact biodiversity? 	
4. To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources	Social – ensure the protection of green spaces and agricultural land for the economy. Economic – the protection of agricultural land will aid the rural economy.	 Reduce the risk of land contamination? Ensure new development does not cause further contamination? Protect soils and prevent soil erosion? Steer new development away from good quality agricultural sites? Help to remediate contaminated land? 	

	Environmental – protection	
	and enhancement of the	
	natural environment.	
5. To reduce the amount of	Social – reduce the	Reduce the risk of
5. To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems	Social – reduce the possible negative impacts of flooding on the community's mental and physical health. Economic – this objective will help to make new and existing developments and businesses resilient to flooding. Environmental –	 Reduce the risk of fluvial, surface water, groundwater and sewer flooding to existing and new developments? Discourage development in areas at risk of flooding? Encourage the use of sustainable drainage systems? Help to reduce the rate of run-off from new developments?
	communities will be resilient	
	to the changing climate.	
6. To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive	Social – ensure healthy drinking water to the community. Environmental – this objective will ensure water pollution is minimalised and that water resources are not overused.	 Improve water quality and maintain a sufficient supply of water? Reduce pollution of groundwater, watercourses and rivers from run-off? Reduce the amount of nitrates/phosphates entering the water environment? Provide adequate utilities infrastructure to service development to avoid impacts on the environment? Safeguard water resources to maintain an adequate level of river and ground water? Reduce the demand for water? Encourage water to be stored for re-use?
7. To conserve, enhance	Social - this objective will	• Enhance the historic and
and promote interest in local	help to ensure the plan area	cultural assets?Protect registered parks
distinctiveness, the historic	maintains and develops a	and gardens?
environment and	high quality built and natural	Protect and enhance the character and

cultural assets and their	Economic – high quality	appearance of conservation areas?
settings	environments will encourage visitors and further	 Improve access to the
	investment to the plan area.	borough's cultural and historical assets?
	investment to the plan area.	Promote the sensitive
		re-use of important buildings?
8. To strengthen the quality	Social – high quality	Ensure new
of the landscape and urban	developments for the use of	development is in keeping with the
townscape and deliver well	the borough's residents.	surrounding character
designed development	Economic – high quality	and distinctiveness?
which respects local	developments will	
character and	encourage further	
distinctiveness	investments in the future.	
	Environmental –	
	development which does not	
	have a negative impact on	
	its surrounding	
	environments.	
9. To ensure the efficient	Social – support overall	• Encourage the efficient
use of mineral resources,	quality of life for current and	use of mineral resources?
including the recycling and	future generations.	Reduce the use of
reuse of existing materials	Economic – protects	primary resources and create a market for
where possible in order to	natural resources which will	recycled materials?
limit the use of primary	aid businesses in the future.	 Encourage the use and supply of sustainable
aggregates and to	Environmental – this	local products or
safeguard their supply	objective will assist in the	services?
	protection of the local	 Help businesses to reduce the
	environment.	environmental impact of
10. Maintain and enhance	Social – improve the quality	products and services?Encourage access to
the quality, accessibility and	of life of the local community	natural urban and rural
connectivity of open space	as open/green space	green space?
and blue and green	improves the physical and	
infrastructure.	mental wellbeing of	
	residents.	
	Environmental – maintain	
	and enhance the quality of	

	the borough's green and	
	open spaces.	
 11. Encourage schemes that contribute to self- sufficiency in waste treatment and encourage local communities to take responsibility for the waste that they generate 12. To provide housing choice and help meet the housing needs of the whole community 	Environmental – this objective will minimise the amount of waste being produced and how it is managed, therefore benefiting the local environment. Social – providing a housing supply to meet the needs of both the present and future generations Economy – the construction of housing developments will help to boost the local economy and employment	 Minimise the production of waste? Encourage the reuse and recycling of materials? Allow waste to be managed close to where it is produced/collected? Encourage residents to use natural resources? Boost the supply of housing? Improve the availability and quality of the housing stock? Provide affordable housing for first time buyers? Provide suitable allocations for gypseys and travellers? Provide extra-care provide extra-care
13. To increase life expectancy and improve the health and mental well- being of the population overall	markets, as well as attract further investment to the area. Social – this objective will help to support a thriving community which is strong, healthy and safe.	 Help to improve the overall health of the community? Help to improve the mental wellbeing of the community? Improve access to healthcare provisions? Encourage healthy lifestyles? Help the community to remain independent and provide assistance to the elderly, those with ill health and those with a disability?
14. To provide a more equitable society where the provision of the widest possible range of community, cultural,	Social – improving the quality of life of the community by lessening social exclusion, deprivation and poverty.	 Ensure accessibility to community facilities? Help overcome social exclusion? Help address the issues of deprivation and poverty?

advactional health	Economic this chiestive	
educational, health,	Economic – this objective	
recreational and leisure	will help the local economy	
facilities, and access to	as it will help to build a	
public transport are	strong, healthy and resilient	
available to all sectors of the	community.	
population with particular		
emphasis on deprived		
neighbourhoods		
15. Reduce crime and the	Social – improving the	Continue to reduce the
fear of crime	quality of life for the	levels of crime in the borough?
	community.	 Improve the feeling of
	Economic – lower crime	safety amongst the
	rates will increase the	community?
	number of visitors and	
	businesses investing in the	
	area.	
16. To reduce the need to	Social – improve the quality	Lessen the need for
travel while increasing	of life by improving	travel?
transport choice and	accessibility across the	 Improve the choice of transport available?
accessibility for all	borough.	
	Economic – ensuring	
	accessible transport for all	
	will help improve the	
	connectivity of the borough	
	and thus, the economy.	
	Environmental – reducing	
	the need to travel will benefit	
	the local environment.	
17. To enable access to the	Social – improving the	 Support both existing and new businesses?
widest range possible of	quality of life for residents by	Support high streets and
shopping and commercial	ensuring access to the	businesses in a post Covid-19 environment?
services for the resident	necessary services and	Encourage local
population	facilities.	businesses?
	Economic – this objective	
	will help to ensure a strong	
	local economy after the fall	

	out of Covid-19 as well as	
	strengthening retail and	
	leisure areas throughout the	
	borough.	
40. To anovido o non no of	-	
18. To provide a range of	Social – a thriving local	 Provide for the needs of the economy, especially
employment land and	economy will help support a	local businesses?
premises that meets the	strong community.	 Encourage diversity and quality of employment
needs of the business	Economic – this objective	types?
community and tackles	will help to produce a strong	 Encourage the provision of higher poid
socio-economic inequalities	and healthy workforce which	of higher paid employment?
within the population	can respond to local	Provide for the needs of
	changes.	business in both rural and urban settings?
	Environmental – a stronger	Encourage local jobs
	local economy will reduce	being filled by local people?
	the need for residents to	Encourage rural
	commute out of the borough	diversification?
	for employment, thus	
	benefiting the local	
	environment.	
19. To protect and enhance	Social – providing the	Support high streets and
the vitality and viability of	community with successful	businesses in a post Covid-19 environment?
the strategic, town, district	service and facility areas.	
and rural centres within the	Economic – this objective	
urban and village areas	will help to strengthen and	
	improve the resilience of the	
	borough's highstreets,	
	particularly in the fall out of	
	the Covid-19 pandemic.	
20. To provide a safe,	Social – a well-established	Reduce the need to
efficient transport network	public transport system will	travel by private vehicle?
and increase the use of	improve access to local	 Encourage the provision of charging
public transport, cycling and	services and facilities.	infrastructure for electric
walking.	Economic – a successful	vehicles?Provide
	public transport system will	walking/cycling/public
	help support the local	transport infrastructure?Provide safe walking
	economy by improving	and cycling routes?
	· · · · ·	

borougn.(education, employment healthcare, retail, leisure and cultural assets)?sustainable transport will mitigate climate change.Reduce existing congestion and mitigate future increases?Improve access to natural greenspaces?		connectivity in to the	•	Improve access to key
 Environmental – sustainable transport will mitigate climate change. Reduce existing congestion and mitigate future increases? Improve access to natural greenspaces? Improve the provision of 	t	oorough.		services and facilities (education, employment, healthcare, retail, leisure
 Reduce existing congestion and mitigate future increases? Improve access to natural greenspaces? Improve the provision of 	E	Environmental –		
 mitigate climate change. congestion and mitigate future increases? Improve access to natural greenspaces? Improve the provision of 	s	sustainable transport will		,
 Improve access to natural greenspaces? Improve the provision of 	r	mitigate climate change.	•	congestion and mitigate
natural greenspaces?Improve the provision of				
Improve the provision of			•	•
affordable public			•	Improve the provision of
transport?				•

Table 35: New SA Objectives

Site Appraisal Framework

A framework for assessing site options has also been developed using the SA Framework as a basis for identifying relevant criteria.

The task of forecasting effects is challenging due to the high-level nature of the SA Objectives, the number of site options and the potential for effects to be mitigated at planning application stage. Nonetheless, it is important to assess sites using a range of quantitative data, as this allows for a consistent and objective comparison between different site options. This data can be then be supplemented with qualitative assessments.

The Site Appraisal Framework is set out on the following pages.

Presenting Findings

The appraisal of each site option will be set out in a table. Account is taken of the nature of effects (including magnitude, spatial coverage and duration), the sensitivity of receptors, and the likelihood of effects occurring. The appraisal identifies and evaluates 'likely effects' against the baseline position of a site being left undeveloped. For each SA Objective, significant positive and negative effects are identified:

- ✓✓ Major positive effect
- Positive effect
- ✓ X Mixed effect
- 0 Neutral effect
- ? Effect unknown or uncertain
- I Dependent on implementation
- X Negative effect
- XX Major negative effect

In order to ensure the site selection criteria effectively shows differentiation between the sites to clearly highlight more sustainable options and significant effects, and to avoid repetition between several criteria, an attempt has been made to narrow the focus of the criterion. For example, there are many factors that could contribute to carbon reduction and adapting to a changing climate (SA criterion 1) which are captured by other objectives, therefore the site selection score against this objective is focused on renewable energy, as other relevant factors such as accessibility and flood resilience are covered by other SA criteria (criterion 5 and 16 respectively).

In most cases for each SA Objective there are several criteria against which effects will be judged. The overall effect for each SA Objective will need to balance the outcomes of these criteria. There is some overlap between SA Objectives and therefore some criteria are used more than once.

A summary of the site appraisal findings for each site will be presented for each of the character areas in the Local Plan.

Reasonable Alternatives

The Strategic Housing Land Availability Assessment (SHLAA) identifies potential future housing sites and assess whether such sites are capable of being developed in order to help demonstrate a future supply of sites. In accordance with national guidance, Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council invited key stakeholders, such as local housing developers, key local landowners and adjoining local authorities to help prepare a robust assessment of housing land availability across the two local authority areas.

The SHLAA is a comprehensive audit of available sites and therefore includes all reasonable alternative housing site options.

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
1	To contribute to the	The planning	Helps increase the	Site proposal	Known	N/A – If the	Development	Development
	reduction of	system should	use and supply of	is known and	opportunities	effect is	will sterilise	of site will
	greenhouse gases and	support the	renewable and low	will deliver	to draw	unknown it	land with	result in a
	adapt to a changing	transition to a low	carbon energy and	renewable	energy	will be	high potential	loss of a
	climate, including	carbon future in a	heat. Sites will be	and low	supply from	scored as (I)	suitability for	renewable
	increasing the use of	changing climate,	considered for	carbon	decentralised	dependent	renewable	energy
	renewable energy and	taking full account	energy generating	energy and	, renewable	on	energy	scheme in
	energy efficiency in	of flood risk (SA	potential against the	associated	or low carbon	implementati	scheme	use
	existing, new	objective 5). It	findings of the	infrastructure	energy	on		
	development and	should help	Staffordshire County-		supply			
	redevelopment.	to shape places in	wide Climate Change		systems.			
		ways that	Adaption and					
		contribute to radical	Mitigation Study					
		reductions in	2020.					
		greenhouse gas						
		emissions,						
		minimise						
		vulnerability and						
		improve resilience;						
		encourage the						
		reuse of						
		existing resources,						
		including the						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
		conversion of						
		existing buildings;						
		and support						
		renewable and low						
		carbon energy and						
		associated						
		infrastructure.						
2	To improve air quality,	Sustain and	Air Quality	Site proposal	Opportunities	Not within an	Within AQMA	Site proposal
	creating cleaner and	contribute towards	Management Area	is known and	to improve air	AQMA		is known and
	healthier air.	compliance	(AQMA). A list of	will improve	quality or			will reduce
		with relevant limit	authorities with	air quality	mitigate			air quality
		values or national	AQMA's can be		impacts			
		objectives for	found from:		through			
		pollutants, taking	https://uk-		traffic &			
		into account	air.defra.gov.uk/aqm		travel			
		the presence of Air	a/list		management			
		Quality			and green			
		Management Areas			infrastructure			
		(AQMA) and the			provision &			
		cumulative impacts			enhancement			
		from individual sites						
		in local areas.						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
		Potential for all						
		Stoke sites to be						
		scored negatively.						
3	To ensure that there is	Need to consider	Consideration of the	Site proposal	Site delivers	No impact on	Partial loss of	Loss of
	an overall net gain in	the opportunities	potential for	is known to	measurable	designated	designated	designated
	the extent and quality	that sites may	biodiversity net gain	deliver	improvement	nature	nature	nature
	of biodiversity.	provide to conserve	as well as loss of	significant	s for	conservation	conservation	conservation
		and enhance	biodiversity and	net gain in	biodiversity	site, and no	site.	site.
		biodiversity and	impact on designated	biodiversity	by creating or	potential to		
		geodiversity, and	areas: RAMSAR,		enhancing	enhance		
		contribute to habitat	Special Areas of		habitats.	biodiversity.		
		connectivity in the	Conservation (SAC)					
		wider area.	and Special					
			Protection Areas					
			(SPA), Site of					
			Special Scientific					
			Interest (SSSI), Local					
			Nature Reserve					
			(LNR), National					
			Nature Reserve					
			(NNR), Local Wildlife					
			Sites (LWS),					
			Regionally Important					

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
			Geological Sites					
			(RIGS). Also, Ancient					
			Woodland, Veteran					
			trees and peatlands					
			such as Cranberry					
			Bog and Chorlton					
			Moss					
4	To reduce	Recognises the	Previously developed	Previously	Previously	N/A	Grade 3, 4	Grade 1 and
	contamination,	economic and other	land or green field	developed	developed		and 5 ,	2, Greenfield
	regenerate degraded	benefits of the best	land. Best and most	land with	land		Greenfield	
	environments, re-use	and most versatile	versatile agricultural	opportunities				
	materials, and	agricultural land.	land: Land in grades	for				
	maintain soil,	Opportunities for	1, 2 and 3a of the	remediating				
	geological and land	remediating and	Agricultural	despoiled,				
	resources.	mitigating	Land Classification.	degraded,				
		despoiled,		derelict,				
		degraded, derelict,		contaminated				
		contaminated and		or unstable				
		unstable land.		land.				
		support the re-use						
		of brownfield land						
5	To reduce the amount	Inappropriate	Fluvial Flood Risk	Flood Zone 1	Developable		Partly Flood	Mostly Flood
	of development within	development in	and Surface Water	and/or	part of the		Zone 2/3	Zone 2/3

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
	locations at risk of	areas at risk of	Flood Risk (including	development	site in Flood		and/or known	and/or known
	flooding and promote	flooding should be	minor watercourses	proposal	Zone 1		Surface	surface water
	the use of sustainable	avoided by	<3km2 catchment	demonstrates			water issues	issues that
	drainage systems.	directing	not modelled by the	a reduction in			affecting part	covers most
		development away	flood zones)	flood risk			of the site	of the site
		from areas at						and/or may
		highest risk						fall in a
		(whether existing or						hotspot/
		future).						CDA.
6	To increase the	Protection of inland	Drinking Water	Known	Not within		Within Outer	Within
	efficient use of water	surface waters and	Safeguard Zones	proposal	Drinking		Source	Drinking
	resources, improve	groundwater.	(Surface Water).	which will	Water		Protection	Water
	water quality and meet			improve the	Safeguard		Zone	Safeguard
	the requirements of		Source Protection	ecological	Zone and/or			Zone and/or
	the Water Framework		Zones.	status of a	Not within			Inner Source
	Directive.			water body	Outer or			Protection
				under the	Inner			Zone
				Water	Protection			
				Framework	Zone			
				Directive				

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
7	To conserve, enhance	Designated	Designated Heritage	Site presents	Site presents	No heritage	Asset not at	Asset not at
	and promote interest	heritage asset: A	Asset and Non-	opportunity	opportunity to	assets	risk and	risk and
	in local distinctiveness,	building,	designated Heritage	to conserve	conserve and	present or	could lose	threatened
	the historic	monument, site,	Asset and Setting.	and enhance	enhance	site would	significance	by demolition
	environment and	place, area or		designated	designated or	present no	as result of	as part of
	landscapes, heritage,	landscape		or non-	non-	risk to	development	development
	cultural assets and	identified as having		designated	designated	designated	and/or	and/or
	their settings.	a degree of		heritage	heritage	or non-	negative	significant
		significance		asset or	asset or	designated	effect on the	negative
		meriting		setting of	setting of	heritage	historic	effect on the
		consideration in		historic asset	historic asset	assets,	environment	historic
		planning decisions,		at high risk	at risk (in	historic	and historic	environment
		because of its		(in terms of	terms of	landscape/to	landscape/to	and historic
		heritage interest. It		ownership,	ownership,	wnscape	wnscape	landscape/
		includes		occupancy	occupancy			townscape
		designated heritage		and	and			
		assets and assets		condition)	condition)			
		identified by the						
		local						
		planning authority						
		(including local						
		listing).Non-						
		designated asset:						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	√	0	Х	XX
	Appraisal Objective							
		e.g. buildings of						
		special local						
		interest, sites of						
		archaeological						
		interest						
8	To strengthen the	Sites should be	Landscape/townscap	Very Low	Low Area of	N/A	Moderate	High or Very
	quality of the	sympathetic to local	e/historic Character	Area of	Landscape		Area of	High Area of
	landscape and urban	character, including	Joint Local Plan	Landscape/	Quality. Not		Landscape	Landscape
	townscape and deliver	the surrounding	Green Belt	townscape/	in Green		Quality.	Quality.
	well designed	built environment	Assessment	historic	Belt.		Weak overall	Moderate or
	development which	and landscape	November 2017	Quality. Not			contribution	Strong
	respects local	setting, while not	(note: score against	in Green Belt			to the Green	overall
	character and	preventing or	Green Belt category				Belt	contribution
	distinctiveness.	discouraging	overrides score for					to
		appropriate	landscape/townscap					the Green
		innovation or	e/historic character					Belt
		change.	for Green Belt sites)					
		The North						
		Staffordshire Green						
		Belt boundary was						
		originally defined in						
		1967. The						
		fundamental aim of						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	√	0	X	XX
	Appraisal Objective							
		Green Belt policy is						
		to prevent urban						
		sprawl by keeping						
		land permanently						
		open; the essential						
		characteristics of						
		Green Belts are						
		their openness and						
		their permanence.						
9	To ensure the efficient	Known locations of	Mineral Safeguarding	Site proposal	Site is not in	N/A	Site is in a	Site is in the
	use of mineral	specific minerals	Area designated by	is known and	a mineral		mineral	immediate
	resources, including	resources of	minerals planning	will deliver	safeguarding		safeguarding	vicinity of, or
	the recycling and	local and national	authorities which	efficient	area		area	in an existing
	reuse of existing	importance should	covers known	minerals				or allocated
	materials where	not be sterilised by	deposits of minerals	extraction				mineral site
	possible in order to	non-mineral	which should be					
	limit the use of primary	development	safeguarded from					
	aggregates and to	where this should	unnecessary					
	safeguard their supply.	be avoided.	sterilisation by non-					
			mineral					
			development.					
			Infrastructure sites					
			used for the					

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
			processing, handling,					
			and transportation, of					
			minerals are also					
			essential to ensure a					
			steady supply. They					
			should also be					
			safeguarded where					
			non-mineral					
			development might					
			otherwise affect their					
			continued operation					
10	Maintain and enhance	Access to a	Provision to access	Provision of	Provision of	Not	Loss of	Loss of
	the quality,	network of high-	to sports and	open/recreati	open/recreati	open/recreati	open/recreati	open/recreati
	accessibility and	quality open	recreation.	onal space or	onal space or	onal space or	onal space or	onal space or
	connectivity of open	spaces and	Public Rights of Way	blue/green	blue/green	blue/green	blue/green	blue/green
	space and blue and	opportunities for	have always been a	infrastructure	infrastructure	infrastructure	infrastructure	infrastructure
	green infrastructure.	sport and	valuable public	in an area of	in an area of	, or no effect.	in an area of	in an area of
		physical activity is	resource giving	deficiency.	good or		surplus or	need, or loss
		important for the	people access to the		adequate		loss of poor	of good
		health and well-	countryside, parks,		supply or		quality site.	quality site.
		being of	open space, local		opportunity to			
		communities.	shops, services and		improve the			
			places of work, for		quality,			

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
			simple recreation		accessibility			
			and for the practical		and/or			
			necessities of life.		connectivity			
			Increasing emphasis		of			
			is now being placed		open/recreati			
			on paths as a		onal space or			
			sustainable and		blue/green			
			healthy alternative to		infrastructure			
			the motor vehicle for					
			local journeys					
			allowing people to					
			avoid the busy road					
			network.					
11	Encourage schemes	The National	Access to Household	Nearest	Nearest		Nearest	
	that contribute to self-	Assessment of	Waste Recycling	Recycling	Recycling		Recycling	Site would
	sufficiency in waste	Civic Amenity Sites	Centre. Waste	and	and		and	directly affect
	treatment and	recommendations	management	Household	Household		Household	waste
	encourage local	for minimum levels	facilities, and waste	Waste Site	Waste Site		Waste Site	management
	communities to take	of Household	management	within 10min	10-20min		more than	facilities or
	responsibility for the	Waste Recycling	infrastructure should	drive time	drive time		20min drive	infrastructure
	waste that they	Centre provision:	be safeguarded from		(10-30mins in		time (30mins	
	generate.		other forms of		rural areas).			

Sustainability	Notes	Criteria	$\checkmark\checkmark$	√	0	X	XX
Appraisal Objective							
	Maximum driving	development which				in rural	
	times to a site for	might otherwise				areas).	
	the great majority	affect their continued					
	of residents of 20	operation.					
	minutes in urban						
	areas, and 30						
	minutes in rural						
	areas; though						
	preferably						
	less than this by						
	the order of 10						
	minutes in each						
	case.						
	Effective waste						
	management relies						
	on the availability of						
	a network of						
	appropriate						
	facilities to receive,						
	sort and treat						
	waste. The						
	continued						
	operation, or						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	Х	XX
	Appraisal Objective							
		expansion of such						
		sites can be						
		compromised by						
		encroachment of						
		other forms of						
		development.						
12	To provide housing	The supply of large	Scale of	The needs of	Site allows	Site for any	Not major	Site proposal
	choice and help meet	numbers of new	development and	groups with	for the size,	other use	housing	is known and
	the housing needs of	homes can often be	proposal, if known.	specific	type and		development	will result in a
	the whole community	best achieved		housing	tenure of		(less than 10	loss of
		through planning		requirements	housing		or more	housing
		for larger scale		will be met.	needed for		homes, or	
		development, such		In rural	different		the site has	
		as new settlements		areas, site	groups		an area of	
		or significant		supports	in the		less than 0.5	
		extensions to		housing	community		hectares).	
		existing villages		development	(including,			
		and towns. Small		that reflect	but not			
		and medium sized		local needs.	limited to,			
		sites can also make			those who			
		an important			require			
		contribution to			affordable			
		meeting the			housing,			

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	√	0	X	XX
	Appraisal Objective							
		housing			families with			
		requirement of an			children,			
		area and are often			older			
		built-out relatively			people,			
		quickly.			students,			
		Provision of			people with			
		affordable housing			disabilities).			
		should not be						
		sought for						
		residential						
		developments						
		that are not major						
		developments.						
13	To increase life	Principles for	Good access to	Potential for	Walking	Walking	Walking	No walkable
	expectancy and	Putting Health into	health care and	on-site	distance to	distance to	distance to	access to
	improve the health and	Place. Consider	facilities.	provision of	healthcare	healthcare	healthcare	healthcare
	mental well-being of	prevention, health		health	200m or less	200-400m	800m	
	the population overall.	protection and		facilities				
		accessibility to						
		health care						
		provision when						
		assessing sites for						
		housing.						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	~	0	X	XX
	Appraisal Objective							
14	To provide a more	Create places that	Areas of Deprivation	Allocations in	Sites with the	Sites outside	Site proposal	Site proposal
	equitable society	are safe, inclusive		a deprived	potential to	deprived	is known and	is known and
	where the provision of	and accessible and		area which	support	areas.	would result	could lead to
	the widest possible	which promote		provide	regeneration		in a loss of	further
	range of community,	health and well-		opportunities	and		community,	segregation
	cultural, educational,	being, with a high		to provide a	investment in		cultural,	in society
	health, recreational	standard of amenity		safer and	deprived		educational,	e.g. gated
	and leisure facilities,	for existing and		more	communities		health,	community in
	and access to public	future users;		inclusive	particularly		recreational	a deprived
	transport are available	and where crime		community	through the		and leisure	area
	to all sectors of the	and disorder, and		and that	development		facilities, or	
	population with	the fear of crime,		promotes	of brownfield		reduce	
	particular emphasis on	do not undermine		well-being.	sites.		access to	
	deprived	the quality of life or					public	
	neighbourhoods.	community					transport	
		cohesion and						
		resilience.						
15	Reduce crime and the	Crime and disorder,	Creating safe and	Opportunity	Opportunity		Location of	Site proposal
	fear of crime.	and the fear of	attractive	to create a	to create a		site or known	is known and
		crime, do not	environments.	safer and	safer and		proposal	has potential
		undermine the		more	more		does not	to increase
		quality of life or		attractive	attractive		provide the	crime, for
		community		environment	environment.		opportunity	example due

Sustainability	Notes	Criteria	$\sqrt{}$	√	0	Х	XX
Appraisal Objective							
	cohesion – for		by			to create a	to the use of
	example through		redeveloping			safer and	the site,
	the use of clear and		land that may			more	operational
	legible pedestrian		be subject to			attractive	hours,
	routes, and high-		fly-tipping or			environment.	proximity to
	quality public		redeveloping				other similar
	space, which		vacant and				uses, or
	encourage the		under-used				issues with
	active and		buildings that				location,
	continual use of		may provide				layout and
	public areas.		opportunities				negative
			for vandalism				impact on
			and anti-				existing
			social				design and
			behaviour.				access of
							surrounding
							area.

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
16	To reduce the need to	Significant	Accessibility to	Walking	Walking	Walking	Walking	Limited
	travel while increasing	development	services including:	distance to	distance to	distance to at	distance to at	access to
	transport choice and	should be focused	1. Public	all facilities,	the majority	least 3 of	least 3 of	facilities
	accessibility for all.	on locations which	Transport, 2. Community	500m or less	(5 or more) of	facilities,	facilities,	within
		are or can be made	Centres,		facilities,	800m or less	2000m or	walking
		sustainable,	 Sports and recreation 		800m or less		less	distance.
		through limiting the	facilities,					
		need to travel and	 Schools (primary and secondary), 					
		offering a genuine	5. Public house,					
		choice of transport	 Post office, GP, 					
		modes. This can	8. Employment.					
		help to reduce						
		congestion and						
		emissions, and						
		improve air quality						
		and public health.						
		The Institute of						
		Highways and						
		Transportation's						
		"Providing for						
		Journeys on Foot"						
		contains at table						
		3.2, suggested						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
		acceptable walking						
		distances, for						
		pedestrians without						
		mobility impairment						
		for some common						
		facilities.						
		Only applies to						
		residential sites.						
47					NA7 11 1			
17	To enable access to		Convenience store	Allocation of	Walking	Walking	Walking	Proposal
	the widest range			a retail use	distance to	distance to	distance to	would result
	possible of shopping				convenience	convenience	convenience	

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
	Appraisal Objective							
	and commercial				store 200m	store 200-	store more	in the loss of
	services for the				or less	800m	than 800m	a retail use
	resident population.							
18	To provide a range of	Planning policies	Allocation of	Allocation of	Allocation of	Development	Loss of	Loss of
	employment land and	and decisions	employment land	sites for	site for	of a site	employment.	employment
	premises that meets	should help create		higher value	employment	without the		site identified
	the needs of the	the conditions in		employment	development.	loss of		for retention.
	business community	which businesses		use.		employment		
	and tackles socio-	can invest, expand						
	economic inequalities	and adapt.						
	within the population.	Significant weight						
		should be placed						
		on the need to						
		support economic						
		growth and						
		productivity, taking						
		into account both						
		local business						
		needs and wider						
		opportunities for						
		development.						
19	To protect and	Sites should	Access to centre, as	Site lies	Site lies		Nearest	Known
	enhance the vitality	support the role	measured to the	within centre	within 800m		identified	proposal may

Sustainability	Notes	Criteria	$\checkmark\checkmark$	✓	0	X	XX
Appraisal Objective							
and viability of the	that town and	centre point of	and offers	of identified		centre is	result in a
strategic, town, district,	village centres play	facilities and services	opportunity to	centre.		more than	loss of
neighbourhood and	at the heart of local		improve its			800m away.	services and
rural centres within the	communities. The		vitality and				facilities in a
urban and village	Sub-Regional		viability.				defined
areas.	Shopping Hierarchy						centre.
	includes Stoke City						
	Centre (Regional),						
	Newcastle-under-						
	Lyme (Sub-						
	Regional), Longton						
	Town Centre						
	(Major District),						
	Festival Retail &						
	Leisure Park						
	(District), Affinity						
	Outlet Mall						
	(Freeport Talke)						
	(Minor District) and						
	local centres.						

	Sustainability	Notes	Criteria	$\checkmark\checkmark$	√	0	X	XX
	Appraisal Objective							
20	To provide a safe,	Significant	Access to a range of	Access to all	Access to all	Access to all	Access to	Access to
	efficient transport	development	sustainable transport	within 300m	within 300m	within 300-	some within	none within
	network and increase	should be focused	solutions, or potential	or the		400m	400m	400m
	the use of public	on locations which	to create new	potential to				
	transport, cycling and	are or can be made	route/connections,	create new				
	walking.	sustainable,	including: bus	links and				
		through limiting the	services, cycle	connections				
		need to travel and	routes, train stations					
		offering a genuine						
		choice of transport						
		modes. This can						
		help to reduce						
		congestion and						
		emissions, and						
		improve air quality						
		and public health.						
		The Institute of						
		Highways and						
		Transportation's						
		"Providing for						
		Journeys on Foot"						
		contains at table						
		3.2, suggested						

opraisal Objective	acceptable walking						
	acceptable walking						
	distances, for						
	pedestrians without						
	mobility impairment						
	for some common						
	facilities.						
		mobility impairment for some common	mobility impairment for some common				

Appendix A: Response from Statutory Consultees

Table showing the response from Statutory Consultees on an early draft of the SA Scoping Report and how their comments have been addressed in the final SA Scoping Report, including whether this has resulted in any changes to the report.

Organisation	Comment	Response	change
Environment	Flood Risk	Noted – as recognised in the comment we have	х
Agency (EA)	Local Plan policies on flood risk should consider the	considered the FRMP at the Scoping stage and will do	
	Humber Flood Risk Management	so when developing policy.	
	Plan (FRMP) available here:		
	https://www.gov.uk/government/publications/humber-		
	riverbasin-district-flood-risk-management-plan. We		
	welcome the inclusion of the Humber, North Western		
	District and Severn FRMPs in the SA Scoping Report.		
EA	Managing and reducing flood risk should be an integral	SA Objective 5 seeks to reduce the amount of	х
	part of any regeneration and growth plans within the Plan	development within locations at risk of flooding. SA	
	area which includes the Lyme Brook as well as a number	Objective 1 seeks to contribute to carbon reduction	
	of their tributaries. Local Plan policies should seek to not	and adapt to a changing climate. As such, this topic	
	only mitigate flood risk but adapt to the impacts of climate	area is covered by the SA objectives. This will help to	
	change by encouraging a reduction in flood risk from	ensure that any Local Plan policy contributes	
	development.	positively towards these objectives.	
EA	Flood risk from all sources of flooding will need to be	Different sources of flooding and the findings of the	x
	considered as part of this Local Plan, as required under	SFRA Level 1 have been considered in the baseline	

Organisation	Comment	Response	change
	NPPF paragraph 156, taking into account the predicted	data section of the Scoping Report. As stated above,	
	impacts of climate change. We note, a Level 1 Strategic	SA Objectives 1 and 5 will help to ensure policies	
	Flood Risk Assessment (SFRA) was published January	within the Local Plan aim to reduce flood risk and	
	2019. The SFRA provides a number of policy	ensure any new development is not at risk both now	
	recommendations which should inform Local Plan policies	and in the future due to climate change.	
	on flood risk and outlines requirements on the application		
	of the Sequential Test and Exception Test. It is important		
	that any policies within the Local Plan aim to reduce flood		
	risk and ensure any new development is not at risk both		
	now and in the future due to climate change.		
EA	A Level 2 SFRA must be produced if any site allocations	Noted, site allocations will be determined in the	x
	within the Flood Zones 2 and / or 3 and require the	Publication Draft. We aim to avoid flood risk areas in	
	Exception Test are brought forward. This will outline the	the first instance but allocations will be supported by	
	principles for development to manage flood risk grounds	an SFRA Level 2, if required.	
	as required under the Exception Test.		
EA	Where sites are at least partially affected by mapped	Consideration will be given to updating the Level 1	x
	floodplain, design and layout should steer development	SFRA, if required, to take into account new modelling	
	away from these Flood Zones in line with the NPPF and	data following the Issues and Options consultation.	
	supporting SFRA. Where detailed modelling has not been	This exercise is not likely to result in changes to the	
	provided for the latest climate change scenarios,	Scoping Report or SA Objectives as these already	
	consideration should be given to undertaking such work	seek to reduce risks from flooding and adapt to a	
	as part of the SFRA process.	changing climate.	

Organisation	Comment	Response	change
EA	In all locations, further assessment should be undertaken	Noted, whilst not a matter for consideration of the SA	х
	to determine whether there is flood risk elsewhere in the	Scoping Report, this may inform a policy approach.	
	catchment which would benefit from being reduced as		
	part of the development, and also whether there may be		
	opportunities to provide that betterment as part of the		
	scheme or not.		
EA	Development should maintain at least an 8 metre	Noted, whilst not a matter for consideration of the SA	х
	easement between all built development and the top of	Scoping Report, this may inform a policy approach.	
	the bank of watercourses to allow for maintenance and		
	inspection requirements. In addition, as the frequency		
	and severity of flooding is set to increase due to the		
	impacts of climate change, this brings increased		
	maintenance requirements of watercourses and flood		
	defences.		
EA	Under Objective 5, consideration should be given to	The comment refers to the assessment criteria which	\checkmark
	providing buffer zones from watercourses to allow	the Council intends to use to assess potential site	
	maintenance of watercourses and resilience from the	allocations. As such, it is not always known what the	
	impacts of climate change. Further to this, we advise for	specific proposal is at the site allocations stage and	
	the assessment of a 'Major positive effect' under the SA	therefore the potential for a buffer from watercourses	
	Framework, developments should demonstrate a	is more likely to be a requirement written into the site	
	reduction in flood risk and not only 'mitigate' risk of	allocations policy (where applicable). The major	
	surface water flooding.	positive effect is used where the site is wholly in Flood	

Organisation	Comment	Response	change
		Zone 1. To account for this comment it has been	
		amended to state 'Flood Zone 1 and/or development	
		proposal demonstrates a reduction in flood risk	
		opportunity to mitigate any risk of surface water	
		flooding'	
EA	Climate Change Allowances Update	Consideration will be given to updating the Level 1	x
	The Environment Agency is in the process of updating the	SFRA, if required, to take into account new modelling	
	allowances for peak river flow and Flood risk	data following the Issues and Options consultation.	
	assessments: climate change allowances following	This exercise is not likely to result in changes to the	
	research completed in 2020. This research sought to	Scoping Report or SA Objectives as these already	
	better understand how different river catchments respond	seek to reduce risks from flooding and adapt to a	
	to changes in rainfall due to climate change within river	changing climate.	
	basin districts. It uses the latest rainfall projections in		
	UKCP18. We are currently developing new allowances		
	that represent the findings of this research, but are also		
	user friendly. We anticipate that the new peak river flow		
	allowances will be published in mid-2021. When they are		
	published we will provide an updated briefing to explain		
	the changes. If you are in the process of updating your		
	SFRA or are aware of FRAs that are being prepared for		
	developments that are likely to be determined in the		
	second half of 2021,		

Organisation	Comment	Response	change
	please contact your local Environment Agency area team		
	for advice.		
EA	The Environment Agency is also in the process of	Noted, in due course consideration will be given to its	x
	updating the allowances for peak river flow in the Flood	applicability to Newcastle Under Lyme	
	and coastal risk management projects, schemes and		
	strategies: climate change allowances guidance, following		
	research completed in 2020. A separate update will be		
	produced and circulated in due course.		
EA	River Channels	Agree with the significance of blue-green	\checkmark
	We recommend further emphasis on blue-green	infrastructure. SA criterion 10 has been amended to	
	infrastructure and corridors as they provide multiple	make specific reference to blue-green infrastructure	
	benefits to areas including services such as creating	and to make reference to connectivity of sites. The	
	habitats, flood management provision, green space,	scoring assessment has also been amended to take	
	cooling local temperatures, ecological function and	this into account.	
	amenity. All developments should create space for water		
	by restoring floodplains and contributing towards blue-		
	green infrastructure.		
	Consequently, blue-green corridors need to be afforded		
	high level of protection from encroaching development in		
	order to facilitate their function, particularly when		
	considering the impacts and need for extra capacity within		
	watercourse corridors due to climate change.		

Organisation	Comment	Response	change
EA	Green spaces can be designed to be less formal areas	Noted, whilst not a matter for consideration of the SA	х
	with more semi-natural habitats. This will reduce	Scoping Report, this may inform a policy approach.	
	maintenance costs and provide better biodiversity and		
	water management potential in relation to the impacts of		
	climate change.		
EA	Habitat connectivity will be particularly important in	Noted, the amendments to criterion 10 and the site	✓
	relation to climate change as species will need to be able	assessment criteria in relation to blue and green	
	to move more freely as environmental changes take	infrastructure should address this point by taking into	
	place. Identifying specific opportunities could be informed	account connectivity between habitats.	
	by strategic plans like the Nature Recovery Network Map.		
EA	Deculverting of watercourses should be a standard policy	Noted, whilst not a matter for consideration of the SA	х
	primarily because it reduces flood risk and creates new	Scoping Report, this may inform a policy approach.	
	ecological habitat (or recreates lost habitat). This will also		
	allow more space to be freed up by for development		
	because new development over culverts is not permitted		
	and would need to remain undeveloped and open, and it		
	can also reduce long-term management implications of		
	the culvert. The new watercourse can be diverted to		
	increase total length around the edge of developments		
	which can provide extra flood event capacity and improve		
	development layout.		

Organisation	Comment	Response	change
EA	Water Framework Directive	Noted – as recognised in the comment we have	x
	The Water Framework Directive (WFD) aims to protect	considered the RBMP at the Scoping stage and will	
	and improve the water environment. Under the WFD	do so when developing policy.	
	there is a requirement for all waterbodies to meet 'Good	SA criterion 6 specifically seeks to increase the	
	Ecological Status or Potential' by 2027. The Plan must	efficient use of water resources, improve water quality	
	ensure that proposals do not jeopardise the current status	and meet the requirements of the Water Framework	
	of a WFD element or cause deterioration to a receiving	Directive. It is therefore considered that the Scoping	
	waterbody.	Report has adequately addressed this point	
	The Humber River Basin Management Plan (RBMP)		
	should be included to reflect the current status of the		
	water environment and to inform on the actions identified		
	to bring your waterbodies up to Good Status as required		
	by the WFD available here:		
	https://www.gov.uk/government/publications/humber-		
	river-basin-district-river-basinmanagement-		
	plan. We welcome the inclusion of the Humber, North		
	Western District and Severn RBMPs in the SA Scoping		
	Report.		
EA	We advise to determine a 'Major positive effect' from	The assessment criterion has been amended in	\checkmark
	development under Objective 6 of the SA Framework, it	accordance with the suggested wording. However, it	
	should be specified that the development improves the	should be acknowledged it is rare at the point of site	
		allocation to know the precise details of a scheme and	

Organisation	Comment	Response	change
	'Ecological Status' of a waterbody under the WFD as a	therefore it is difficult to score a major positive effect in	
	clear indicator.	relation to this category	
EA	Water Resources & Wastewater	The Local Plan will take this into account.	x
	The Local Plan should consider the capacity and quality	Consideration will be given to updating the WCS, if	
	of water supply systems and any impact development	required, particularly in relation to any changes to the	
	may have on the environment, including understanding	quantum of housing in proximity to particular Waste	
	the supply and demand patterns now and in the future	Water treatment Works, where it is noted in the 2020	
	across the Plan area. We note a Water Cycle Study	study that there may be issues with capacity.	
	(WCS) was published in 2020 and should inform choices		
	on levels of growth and distribution in relation to water		
	and wastewater supplies.		
EA	Regulated Sites	The Local Planning Authority consults with, invites	x
	Local plan policies should identify high risk regulated	comments and will set up meetings where required	
	facilities, steer development away from such areas and	with the Environment Agency and has regular	
	ensure that if development is proposed in close proximity	dialogue with Staffordshire County Council as the	
	it is not of a 'sensitive' nature to such nuisances. Close	Minerals and Waste Planning Authority. The Local	
	liaison with the waste planning authority and the	Planning Authority has access to records of	
	Environment Agency should be maintained to ensure the	safeguarded minerals and waste sites as well as	
	plan reflects joined-up working.	water infrastructure such as Waste Water Treatment	
	Further to this, NPPF paragraph 182 requires	Works and considers this when assessing potential	
	safeguarding of regulated sites that could have an	site allocations.	
	adverse effect on new development. 'Safeguarding' can		

Organisation	Comment	Response	change
	also refer specifically to providing for appropriate future		
	expansion of existing infrastructure. The NPPF now		
	allows commercial properties to be converted to		
	residential use, such as offices on industrial estates. It		
	should be made clear that the Environmental Permitting		
	Regulation does not demand 'zero impact', so where		
	development is allowed too close, conflict may occur.		
EA	Waste	The comments will be taken into account when	х
	Your plan should show how you have worked	developing the Local Plan and the Local Planning	
	constructively alongside the Waste Planning Authority	Authority continue to have regular dialogue with	
	(WPA) to ensure waste management is considered	Staffordshire County Council as the Waste Planning	
	alongside other spatial planning objectives. The timing	Authority. The following SA criterion relate to these	
	and phasing of development should be synchronised with	point:	
	the delivery of appropriately located modern and	4. To reduce contamination, regenerate degraded	
	sustainable waste management infrastructure that meets	environments, re-use materials, and maintain soil,	
	the needs of the local community. Opportunities to	geological and land resources.	
	integrate waste management into proposed new	9. To ensure the efficient use of mineral resources,	
	development should be considered.	including the recycling and reuse of existing materials	
	Services provided should encourage and enable	where possible in order to limit the use of primary	
	communities to follow the waste hierarchy – reduce, re-	aggregates and to safeguard their supply.	
	use, recycle, recover, with landfill as the last resort.	11. Encourage schemes that contribute to self-	
	Waste minimisation and resource efficiency should be at	sufficiency in waste treatment and encourage local	

Organisation	Comment	Response	change
	the heart of all new development. The design of buildings	communities to take responsibility for the waste that	
	and supporting infrastructure should consider their future	they generate.	
	repair and eventual demolition in the selection of		
	construction mechanisms and materials ('cradle to-cradle'		
	design).		
EA	Surface Water	We maintain regular dialogue with Staffordshire	x
	Staffordshire County Council, as Lead Local Flood	County Council as Lead Local Flood Authority and	
	Authority, should be consulted regarding surface water	they are involved with evidence creation including the	
	issues and suitable measures to deal with surface water	Strategic Flood Risk Assessments.	
	arising from development proposals required to minimise		
	the impact to and from new development.		
Historic	Page 14, we would recommend also including the	Agreed, the document has been amended to include	\checkmark
England (HE)	National Planning Policy Framework and guidance	references to this guidance.	
	documents which relate to heritage. In terms of a national		
	perspective we would recommend that you include the		
	Good Practice Advice Notes and Historic Environment		
	Advice Notes, within this section. I include the link here		
	which references the specific documents:		
	https://historicengland.org.uk/advice/planning/planning-		
	system/		
HE	Under 'local environmental' on page 21 we would	Agreed, the document has been amended to include	 ✓
	recommend that you include local heritage information	references to these sources and research has been	

Organisation	Comment	Response	change
	such as the Staffordshire Historic Environment Record/	undertaken to determine if there are any further	
	Newcastle under Lyme Local List/ are there any local or	sources.	
	sub regional heritage strategies or programmes that can		
	be included in this section? Public Realm Strategy or		
	Infrastructure Strategy that seeks to enhance heritage?		
HE	Page 53, it would be useful to include what Grade the	Agreed, this has been actioned.	\checkmark
	Registered Park and Gardens are.		
HE	Page 54, are any of the Conservation Areas at risk? Do	Text added to clarify the Borough specific situation	\checkmark
	they all have up to date management plans?	regarding these aspects.	
HE	We are supportive of the inclusion of a local list in the	Support noted.	x
	Council area and the intention to conserve local heritage.		
HE	Is there any heritage at risk in the Borough? And how	The Borough Council conduct a Buildings at Risk	x
	may the Local Plan address this?	Survey, with the most recent of which (undertaken in	
		2016) identifying a total of 14 buildings that fall within	
		this category. Consideration will be given to the	
		appropriate policy context to deliver conservation and	
		enhancement of the historic environment, and as	
		appropriate, this will be set out in the Local Plan at the	
		Publication Stage (Autumn 2022)	
HE	Page 101 references that some effects may be uncertain	The effect of a policy approach is generally known	x
	or unknown. We are particularly keen that any effects for	and scored, but there are some instances where full	
		effects can only be truly known at the detailed	

Organisation	Comment	Response	change
	the historic environment are known and avoided/ or	planning application stage. The Local Plan policy can	
	mitigated.	specify requirements to help overcome the potential	
		issue of unknown effects.	
HE	We welcome objective 7 as a specific objective for the	Support noted.	x
	historic environment and are keen to see that this is		
	included within the SEA.		
HE	In the table on page 108 we would recommend that the	Agreed, the definition from the NPPF Glossary has	\checkmark
	references relate to 'heritage assets' to meet the definition	replaced the former text.	
	of the NPPF.		
HE	We recommend that objective 8 also relates to historic	This is already specifically covered in SA objective 7	х
	landscapes and townscapes and these considerations	and therefore all sites and policies will be considered	
	are included, especially with respect to cumulative	with regard to their impact on historic landscapes. The	
	impacts.	scoring for SA objective 7 has been amended to	
		ensure this is fully considered.	
HE	Our expectation would be that where effects are identified	Sites or policy approaches which are deemed to have	х
	that the SEA sets out how these could be avoided and	a negative impact to the SA criterion should be	
	mitigated against and that there is specific text or actions	avoided. The Local Plan will contain a heritage policy	
	that can be included within the Local Plan, to ensure that	will may set out a strategy or series of steps for	
	these measures are taken at the appropriate time.	applicants to ensure risks to heritage are mitigated for	
		development proposals. In terms of mitigation, the	
		solution may be unique to the individual proposal,	
		therefore mitigation requirements will be specified in	

Organisation	Comment	Response	change
		relation to individual policies or site allocations in the	
		plan.	
HE	We would be willing to comment on any indicators that	Monitoring indicators will be set out in the Local Plan	х
	can be used to measure the success of the objectives set	at Publication Stage (Autumn 2022)	
	out in this scoping report.		
Natural	Natural England has not reviewed the plans listed.	The Local Plan will be supported by an Open Space	х
England (NE)	However, we advise that the following types of	and Green Infrastructure Management Plan and a	
	plans relating to the natural environment should be	Landscape Character Assessment.	
	considered where applicable to your plan area;		
	Green infrastructure strategies		
	Biodiversity plans		
	 Rights of Way Improvement Plans 		
	Shoreline management plans		
	Coastal access plans		
	River basin management plans		
	 AONB and National Park management plans. 		
	 Relevant landscape plans and strategies 		
NE	Evidence	Noted.	х
	Please see Annex A for our advice on sources of local		
	plan evidence on the natural environment.		

Organisation	Comment	Response	change
NE	Objective 1.)	Accepted, the wording for criterion 1 has been	\checkmark
	Carbon dioxide is not the only greenhouse gas that	amended to reflect the need for a reduction in	
	contributes to climate change, some of the other main	greenhouse gases, and not just carbon.	
	greenhouse gases are methane, nitrous oxide, fluorinated		
	gases. We would suggest broadening the SA objective to		
	include reducing these other greenhouses gases.		
NE	Objective 3.)	These sites are subject to protection by the Habitats	x
	The borough contains two statutory protected RAMSAR	Regulations and as such, every policy and site	
	sites; Midland Meres and Mosses Phase 1 & 2 at Betley	allocation will be considered as to their potential effect	
	Mere along with fiver Site of Special Scientific Interest	on these sites in the Habitats Regulation Assessment	
	(SSSI). The objective does not adequately cover these	(HRA) which accompanies the Local Plan. In addition,	
	sites and should be reworded or a new objective should	whilst the wording of the objective does not make	
	be added.	reference to individual sites, the scoring criteria in the	
		Site Appraisal Framework does specifically relate to	
		impact on designated sites and scores a site poorly if	
		this is negative. As such we think this point is	
		important but is adequately covered through the SA	
		and through the HRA.	
NE	SA Objective Indicators	The natural environment metrics in the baseline	x
	As set out in Planning Practice Guidance, you should be	information are used to provide an overview and	
	monitoring the significant environmental effects of	snapshot picture of the characteristics of the Borough	
	implementing the current local plan. This should include	which help to inform the development of the SA	

Organisation	Comment	Response	change
	indicators for monitoring the effects of the plan on	Objectives. They are not used as a mean to monitor	
	biodiversity (NPPF para 117).	performance of the Local Plan. A separate defined list	
	The natural environment metrics in the baseline	of monitoring indicators will be published alongside	
	information are largely driven by factors other than the	draft policies and site allocations in the Publication	
	plan's performance. They are thus likely to be of little	Draft of the Local Plan (anticipated Autumn 2022). We	
	value in monitoring the performance of the Plan.	will review your suggested indicators at that time to	
	It is important that any monitoring indicators relate to the	see if they are appropriate and applicable.	
	effects of the plan itself, not wider changes.		
	Bespoke indicators should be chosen relating to the		
	outcomes of development management decisions.		
	Whilst it is not Natural England's role to prescribe what		
	indicators should be adopted, the following indicators may		
	be appropriate.		
	Biodiversity:		
	Number of planning approvals that generated any		
	adverse impacts on sites of acknowledged biodiversity		
	importance.		
	Percentage of major developments generating overall		
	biodiversity enhancement.		
	Hectares of biodiversity habitat delivered through		
	strategic site allocations.		
	Green infrastructure:		

Organisation	Comment	Response	change
	Percentage of the city's population having access to a		
	natural greenspace within 400 metres of their home.		
	 Length of greenways constructed. 		
	Hectares of accessible open space per 1000 population.		
	Soil		
	The amount of soil sealed.		