

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan (2020-2040)

Regulation 19 SA Report

Volume 1 of 3: Non-Technical Summary

July 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan 2020-2040

Including: Strategic Environmental Assessment and
Equality Impact Assessment

Regulation 19 SA

Volume 1 of 3: Non-Technical Summary

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1 Introduction

The purpose of this report

- N1. Lepus Consulting Ltd (Lepus) has been instructed by Newcastle-under-Lyme Borough Council (NuLBC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA) and Equality Impact Assessment (EqIA), for the Newcastle-under-Lyme Local Plan (2020-2040).
- N2. The Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform NuLBC's preparation of the Newcastle-under-Lyme Local Plan.
- N3. This document comprises a Non-Technical Summary (NTS) of the Regulation 19 SA for the Newcastle-under-Lyme Local Plan, which presents an assessment of the likely sustainability impacts of proposals set out in the Plan. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2**: The Main SA Report and **Volume 3**: Appendices to the main SA Report.

The Newcastle-under-Lyme Local Plan

- N4. The UK Government requires that local plans should be reviewed every five years and updated as necessary. In 2021, NuLBC decided to begin preparation of a new local plan for Newcastle-under-Lyme Borough, following the ending of work on the Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan.
- N5. The emerging Local Plan for Newcastle-under-Lyme will set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure. The Plan will also set out a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- N6. The Local Plan will seek to:
- Reflect the issues that have arisen since adoption of the Council's current development plan documents;
 - Provide for the additional new housing and other development that will be required to meet future identified needs;
 - Establish a plan period up to 2040 in order to ensure appropriate time horizon; and
 - Demonstrate sustainable development that helps combat climate change and carbon reduction.
- N7. Once adopted, the Newcastle-under-Lyme Local Plan will replace the current planning policies set out in the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved local plan policies from the Newcastle-under-Lyme Local Plan (adopted 2003).

What is Sustainability Appraisal and Strategic Environmental Assessment?

- N8. The Planning and Compulsory Purchase Act¹ requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations² (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including development plan documents, to ensure that environmental issues are fully integrated and addressed during decision-making.
- N9. SA is the process of informing and influencing the preparation of a local plan or development plan document to optimise its sustainability. SA considers the social, economic and environmental performance of the plan. The SA (and SEA) can help to ensure that 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 tests of soundness have been met. SA should be applied as an iterative process informing the plan throughout its development.
- N10. Sustainability can be defined as “*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*”³. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1**).

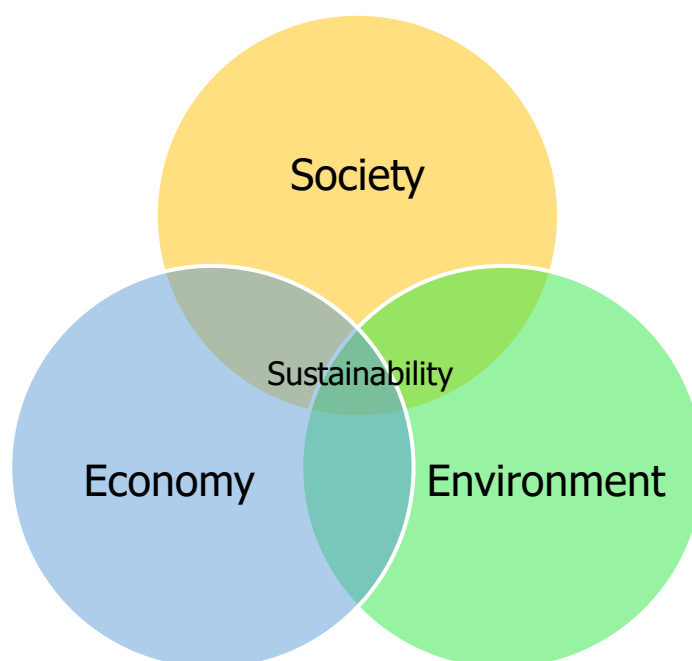


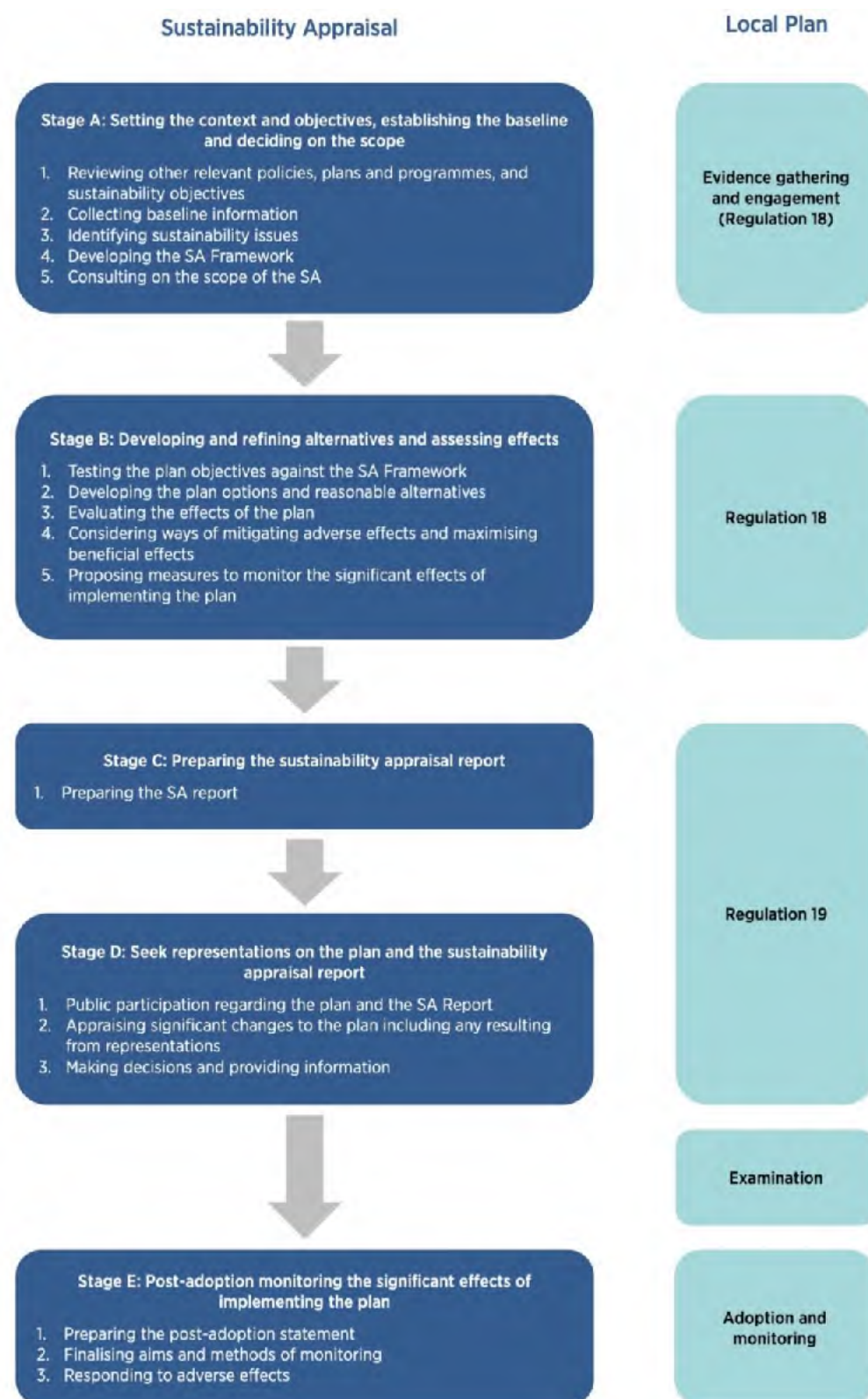
Figure N.1: Sustainable development

¹ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 03/07/24]

² The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 03/04/24]

³ Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date accessed: 03/07/24]

N11. The Newcastle-under-Lyme Local Plan is at the plan-making stage Regulation 19, known as 'Publication' in the Local Plan Regulations 2012⁴, as shown in Stage C of **Figure N.2**.



⁴ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767

Figure N.2: Sustainability Appraisal and Local Plan process

What is Equality Impact Assessment?

- N12. The aim of the Equality Act (2010)⁵ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and thus includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and employment and do all they can to promote equality.
- N13. EqIA is a systematic and evidence-based tool, which enables the Council to consider the likely impact of the Local Plan on different groups of people who share a protected characteristic⁶, identified in the Equality Act. Completion of EqIAs is a legal requirement under race, disability and gender equality legislation.
- N14. The EqIA has been incorporated within the 'population and material assets' SEA topic in the Regulation 19 SA. Additionally, the Local Plan policies have been screened for their potential effects on the protected characteristics (as identified in the Equality Act) in **Appendix K**.

Newcastle-under-Lyme Borough

- N15. The area covered by the Local Plan is Newcastle-under-Lyme Borough (see **Figure N.3**) which comprises approximately 21,095ha and is located within the County of Staffordshire, between Manchester and Birmingham. The borough has an estimated population of 123,300 as of 2021⁷.
- N16. The strategic centre and market town of Newcastle-under-Lyme lies in the north east of the borough, with the town of Kidsgrove to the north, surrounded by rural centres. The City of Stoke-on-Trent lies adjacent to Newcastle-under-Lyme to the east, with the north-east of the borough falling within the Stoke-on-Trent Green Belt.
- N17. The Peak District National Park lies approximately 9.8km to the north east of the borough. The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent.
- N18. The borough contains two Ramsar Sites recognised for their internationally important wetlands: Midland Meres and Mosses Phase 1 and 2 at Betley Mere. A range of statutory and non-statutory biodiversity designations can also be found in the borough, including Sites of Special Scientific Interest (SSSI), several stands of ancient woodland, Local Nature Reserves (LNRs) and local Sites of Biological Importance (SBIs), as well as a range of priority habitats.

⁵ Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 04/07/24]

⁶ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

⁷ Office for National Statistics (2021). How life has changed in Newcastle-under-Lyme: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000195/#> [Date accessed: 15/01/24]

- N19. Several watercourses pass through the borough including the Lyme Brook (a tributary of the River Trent) in the east through Newcastle-under-Lyme Town Centre, as well as the River Lea in the east. Some areas of Flood Zone 2 and 3 are present alongside these watercourses.
- N20. Newcastle-under-Lyme has a rich historic environment, with a suite of cultural heritage designations including 365 Listed Buildings (Grade I, II* and II), 13 Scheduled Monuments (SMs), two Registered Parks and Gardens (RPGs) and several conservation areas, as well as a range of non-designated locally important buildings and structures.

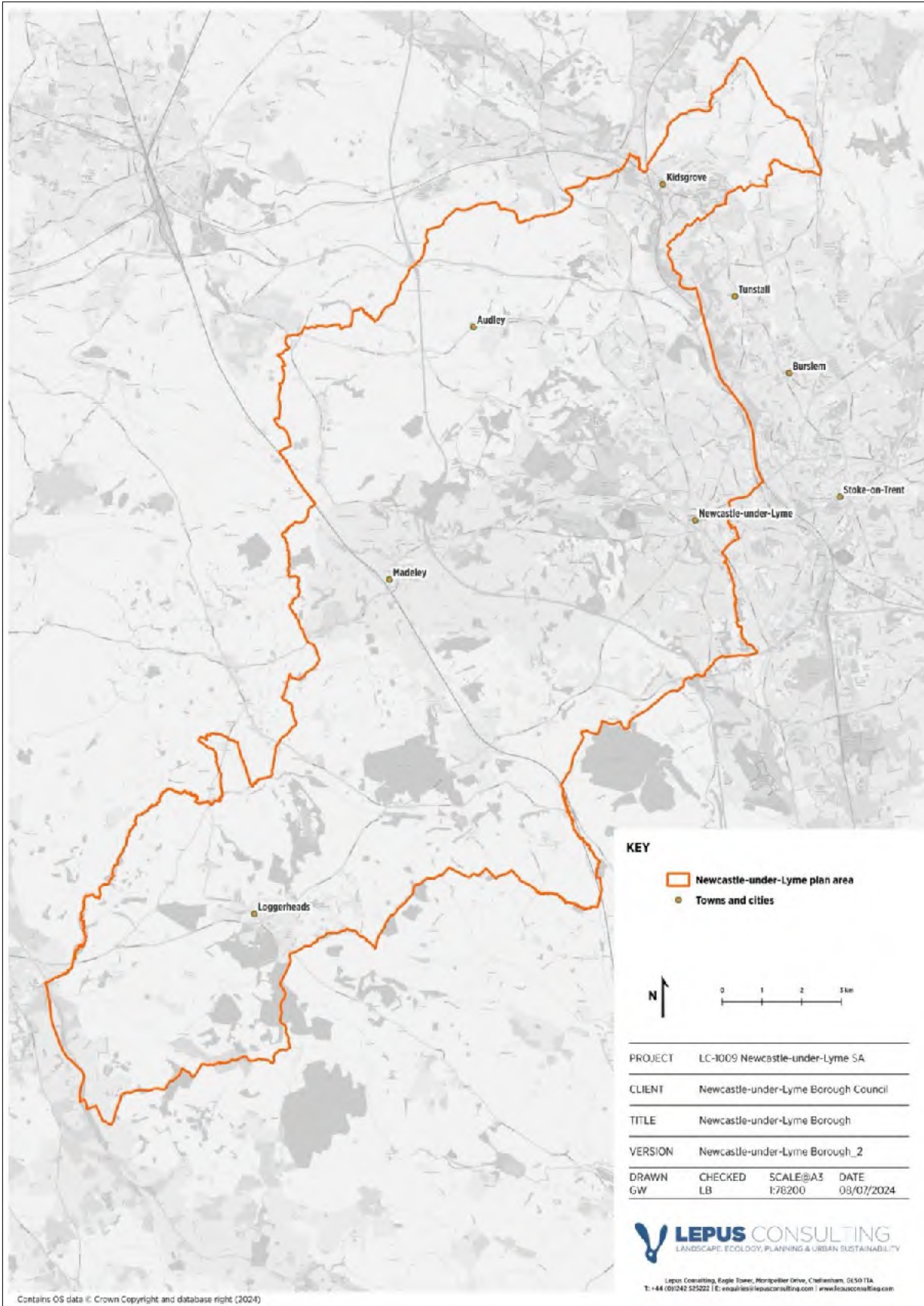


Figure N.3: Map of Newcastle-under-Lyme Borough

The SA process alongside the Newcastle-under-Lyme Local Plan

- N21. **Figure N.4** provides an overview of the stages that have been undertaken during the preparation of the Local Plan and the accompanying SA outputs and summarises the purpose and content of each.
- N22. Each stage included consultation with the statutory bodies for SA/SEA: Historic England, Natural England and the Environment Agency. Comments received were taken into consideration during the preparation of the SA outputs.



Figure N.4: Stages in the plan-making process accompanied by SA outputs

Scoping

- N23. The preparation of a Scoping Report was the first phase of the SA process. The scoping process set the criteria for assessment (including the SA Objectives) and established the baseline data and other information, including a review of relevant policies, programmes and plans (PPPs). The scoping process involved an overview of key issues, highlighting areas of potential conflict. The output of the scoping phase was the SA Scoping Report prepared by NuLBC in 2021⁸.

⁸ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s35932/SA%20Scoping%20Final%200002.pdf> [Date accessed: 15/01/24]

Regulation 18

- N24. The Regulation 18 followed the Scoping Report as the next SA output, prepared by Lepus in 2023⁹. The purpose of this report was to assess the sustainable development implications of proposals presented in the 'First Draft Local Plan' for NuLBC. The Council identified various reasonable alternatives that were assessed including a suite of 141 reasonable alternative sites and 23 draft policies. Additionally, three housing growth options, three employment growth options and six growth direction options that were identified through a previous plan-making phase known as 'Issues and Strategic Options'¹⁰ were evaluated within the Regulation 18 SA; these options represented high-level options for the scale and distribution of new growth across the Plan period.

Regulation 19

- N25. The Regulation 19 SA Report (this report) includes a summary of the SA process to date and has been prepared to help inform the examination stage of the preparation of the Newcastle-under-Lyme Local Plan. The SA Report has been prepared to meet the requirements of an SEA Environmental Report. It also sets out the assessment of additional reasonable alternatives that have been identified by NuLBC since the Regulation 18 stage, including six updated housing and employment growth options, 27 new/amended reasonable alternative sites, one new growth direction option, four new 'growth scenario options' and three safeguarded land options.
- N26. Another key purpose of the Regulation 19 SA is to document information regarding NuLBC's selection and rejection of the different types of reasonable alternatives that were evaluated throughout the SA process.

⁹ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 26/06/24]

¹⁰ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 18/04/24]

2 Purpose and content of the Regulation 19 SA Report

The purpose of the Regulation 19 SA

- N27. The Regulation 19 SA Report has been prepared to summarise the SA process to date and help inform the examination stage of the preparation of the Local Plan. The Regulation 19 SA Report presents the findings of the sustainability appraisal of the Newcastle-under-Lyme Local Plan, which is composed principally of 55 policies,
- N28. The purpose of the SA of the Local Plan is to:
- Identify, describe and evaluate the likely sustainability effects of the LP proposals and their reasonable alternatives;
 - Inform the Council's decision making and preparation of the LP; and
 - Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA.

Structure of the Regulation 19 SA Report

- N29. The SA of the Newcastle-under-Lyme Local Plan is presented in three volumes:
- N30. **Volume 1** (this document) comprises the **Non-Technical Summary** (NTS) which provides a summary of the Regulation 19 SA.
- N31. **Volume 2** comprises the Main Regulation 19 SA Report, which is structured as follows:
- **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the Local Plan and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the Plan.
 - **Chapter 4** sets out the SA methodology.
 - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
 - **Chapter 6** presents details on the preferred approach as set out in the Plan.
 - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic (air; biodiversity, flora and fauna; climatic factors; cultural heritage; human health; landscape; population and material assets; soil; and water).
 - **Chapter 16** presents the cumulative effects assessment.
 - **Chapter 17** sets out a range of monitoring recommendations for the Local Plan.
 - **Chapter 18** summarises ways in which the SA has influenced the Local Plan throughout the plan making process, including through recommendations made in the SA.
 - **Chapter 19** outlines the conclusions, residual effects and next steps.

N32. **Volume 3** comprises the appendices to the Regulation 19 SA Report, including:

- **Appendix A** presents the SA Framework.
- **Appendix B** presents a review of other relevant policies, plans and programmes (PPPs).
- **Appendix C** presents the consultation responses received during each stage of the SA process from statutory consultees and other interested parties.
- **Appendix D** presents the assessment of the latest growth direction option, residential and employment growth options, growth scenarios, and safeguarded land options.
- **Appendix E** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess reasonable alternative sites.
- **Appendix F** presents the assessment of 36 new/amended reasonable alternative sites (pre-mitigation) identified at this stage.
- **Appendix G** presents the assessment of the Local Plan policies (strategic and non-strategic policies).
- **Appendix H** summarises the assessment of all 177 reasonable alternative sites assessed through the SA process (pre-mitigation), considers the potential mitigating influence of the Local Plan policies, and presents the post-mitigation assessment of all 177 reasonable alternative sites.
- **Appendix I** presents NuLBC's outline reasons for selection and rejection of all reasonable alternative sites which have been identified, described and evaluated through the SA process.
- **Appendix J** presents the assessment of the Local Plan site allocation policies.
- **Appendix K** presents the Equality Impact Assessment (EqIA) screening of policies.

3 Baseline and key sustainability issues

Overview

- N33. The SEA Regulations requires the Environmental Report to present *"an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes", "the environmental characteristics of areas likely to be significantly affected"* and *"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance"*.
- N34. There are a number of plans, policies and programmes (PPPs) that set out the environmental protection objectives which proposals within the Local Plan should adhere to. These are discussed within the Scoping Report and are updated in **Appendix B**. Some examples of these include the NPPF and the Habitats Regulations, as well as regional or local guidance and strategies such as local transport initiatives, the Staffordshire Local Nature Partnership and the Newcastle-under-Lyme Open Space and Green Infrastructure Strategy.
- N35. PPPs that could potentially affect the Local Plan have been reviewed and considered alongside the current characteristics of the Plan area.
- N36. **Volume 2** (the main Regulation 19 SA Report) includes information relating to the baseline and key issues for the Local Plan area, drawing on information gathered during the Scoping stage, relating to the following sustainability topics (which incorporate the topics identified in Schedule 2 of the SEA Regulations¹¹):
- Air;
 - Biodiversity, flora and fauna;
 - Climatic factors;
 - Cultural heritage;
 - Human health;
 - Landscape;
 - Population and material assets;
 - Soil; and
 - Water.
- N37. An overview of each topic, including the key issues, is provided below.

¹¹ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including *"issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."*

Air

- N38. The air theme considers the implications of new development for air pollution including the potential exposure of new residents to existing areas of poor air quality such as alongside the strategic road network and within Air Quality Management Areas (AQMAs).
- N39. 'Air quality' has been considered in the SA assessments primarily within SA Objective 2 (Air), and SA Objective 9 (Health and Wellbeing).

Key issues relating to air quality

- ⇒ There are currently three AQMAs within Newcastle-under-Lyme, all declared in 2015, with NO₂ being the pollutant: 'Kingsgrove' AQMA, 'Newcastle-under-Lyme Town' AQMA and 'Maybank, Wolstanton, Porthill' AQMA.
- ⇒ New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality.
- ⇒ Newcastle-under-Lyme is above the England average for cases of asthma, chronic obstructive pulmonary disease and coronary heart disease. These diseases are considered indicators of poor air quality.
- ⇒ Approximately 5.0% of mortality in the borough was attributable to particulate matter air pollution in 2021.

Biodiversity, flora and fauna

- N40. The biodiversity and geodiversity theme considers how the proposed development would affect statutory and non-statutory biodiversity and geodiversity designations with Newcastle-under-Lyme, including European sites¹², Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNR), Local Wildlife Sites (LWS), ancient woodland and priority habitats.
- N41. 'Biodiversity, flora and fauna' has been considered in the SA assessments primarily within SA Objective 3 (Biodiversity, Flora and Fauna).
- N42. Likely significant effects of the Local Plan on European sites are explored in more detail in the Habitats Regulations Assessment (HRA) process.

¹² These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, paragraph 181 of the NPPF (2023) requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated Habitats sites.

Key issues relating to biodiversity, flora and fauna

- ⇒ There are several internationally, nationally and locally designated sites of biological and geological importance in the borough.
- ⇒ Important sites and habitats may be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution.
- ⇒ It will be necessary to ensure there will be no adverse impact on the site integrity of European sites, either alone or in-combination, as a result of the Newcastle-under-Lyme Local Plan via the emerging HRA.
- ⇒ The entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition.
- ⇒ It is essential that there is a coherent ecological network of habitats that enable the free movement of species and gene exchange, and that this is not compromised through development proposed in the Local Plan.
- ⇒ There is an extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares. Both should be conserved and enhanced.

Climatic factors

- N43. The climate change theme considers the implications of new development on greenhouse gas (GHG) emissions, the extent and coverage of green infrastructure (GI), as well as fluvial, coastal and surface water flood risk.
- N44. 'Climate change' has been considered in the SA assessments primarily within SA Objectives 1 (Climate Change), SA Objective 2 (Air), SA Objective 5 (Flooding), and SA Objective 9 (Health and Wellbeing).

Key issues relating to climatic factors

- ⇒ The frequency and severity of flooding is set to increase due to the impacts of climate change.
- ⇒ The borough is expected to move towards warmer wetter winters, hotter drier summers, with an increase in the frequency and intensity of extreme events.
- ⇒ New development should incorporate energy efficiency measures and climate change adaptive features, in order to respond to predicted levels of climate change.
- ⇒ As of 2018, transport is responsible for 48.8% of carbon related emissions within the borough.
- ⇒ The borough's primary fluvial flood risk is along the Lyme Brook, a tributary of the River Trent. There is also a risk of fluvial flooding from the Lyme Brook in the villages of Silverdale, Knutton, and Cross Heath.
- ⇒ The borough is at risk of surface water flooding. The urban area of Newcastle and Silverdale has been identified in the Flood Risk Management Strategy as one of the top ten urban areas at risk of surface water flooding in the county.
- ⇒ Sewer flooding is a key issue in the borough, with Kidsgrove, Talke, Audley, and Bignall

Cultural heritage

- N45. The cultural heritage theme considers how the proposed development would affect statutory and non-statutory cultural heritage assets including Listed Buildings, Registered Parks and Gardens (RPGs), Scheduled Monuments (SMs) and Conservation Areas, as well as the wider historic environment and non-designated assets such as archaeology.
- N46. 'Cultural heritage' has been considered in the SA assessments primarily within SA Objective 7 (Cultural Heritage).

Key issues relating to cultural heritage

- ⇒ The borough supports a range of heritage assets including listed buildings, conservation areas, scheduled monuments and registered parks and gardens.
- ⇒ Development in the borough may have the potential to lead to effects on historic landscapes and cause direct damage to archaeological sites, monuments, and buildings and / or their settings.
- ⇒ Archaeological remains, both seen and unseen, could potentially be affected by new development.

Human health

- N47. The human health theme considers the potential for sustainable access to healthcare facilities (GP surgeries and NHS hospitals), leisure centres and green spaces for new residents.
- N48. 'Health' has been considered in the SA assessments primarily within SA Objectives 9 (Health and Wellbeing) and 10 (Equality), although there is some overlap with other objectives such as SA Objective 2 (Air) in terms of the implications of poor air quality for human health and wellbeing.

Key issues relating to human health

- ⇒ According to data from the year ending September 2023, there has been an annual increase in some types of crime including violence involving a knife, violence against a person, violence without injury, stalking and harassment, and public disorder offences.
- ⇒ Hospital admissions for intentional self-harm are significantly higher in the borough compared to the West Midlands and England.
- ⇒ The borough has a higher occurrence of diseases and health-related issues when compared to England and the West Midlands, including obesity, diabetes, cardiovascular disease and liver disease.
- ⇒ There is a need for new open space to accompany new development, to ensure that the open space provision keeps pace with population growth.

Landscape

- N49. The landscape theme considers how the proposed development would integrate with existing local character and potential effects on views. Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development.
- N50. 'Landscape' has been considered in the SA assessments primarily within SA Objective 8 (Landscape).

Key issues relating to landscape

- ⇒ A large proportion of Green Belt is located in the north of the borough, of which large areas are identified to make moderate or strong contributions to the purposes of the Green Belt as set out in the NPPF.
- ⇒ The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington. There are areas of medium landscape sensitivity in the centre of the borough, within Madeley and High Lane.
- ⇒ Five Landscape Character Types have been identified in the borough. Their key features that contribute to their landscape character would need protection from adverse impacts associated with development. Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.

Population and material assets

- N51. The population theme considers the implications for new development on meeting housing and employment needs, addressing inequalities and providing access to jobs and services. Material assets include a variety of built assets including healthcare, schools and essential infrastructure, as well as mineral resources and other natural assets. Together these themes seek to create places where residents have good access to services to meet their day-to-day needs, supporting a healthy and vibrant population.
- N52. 'Population and material assets' has been considered in the SA assessments across a number of SA Objectives including 4 (Natural Resources and Waste), 9 (Health and Wellbeing), 10 (Equality), 11 (Transport and Accessibility) and 12 (Economy).

Key issues relating to population and material assets

- ⇒ The borough's economy is growing at a slower rate than neighbouring boroughs, providing less job opportunities.
- ⇒ The amount of business units in the borough has grown at a significantly lower rate than average for the West Midlands and nationally.
- ⇒ The borough contains 79 LSOAs, of which two are identified as being within the most deprived 10% of LSOAs nationally.
- ⇒ Housing stock growth in Newcastle-under-Lyme has grown by circa 1.9%, slower than rates in the West Midlands (3.5%) and England (3.7%), therefore, housing prices are expected to increase.
- ⇒ There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work.
- ⇒ The borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones.
- ⇒ Mineral Safeguarding Areas are spread across the borough and should be protected.
- ⇒ The council should seek to increase the scope of goods that are collected to be recycled to reduce the large amount of waste produced in the borough.

Soil

- N53. The soil theme considers the implications of new development on soil resources (including agriculturally valuable 'best and most versatile' (BMV) land).
- N54. 'Soil' has been considered in the SA assessments primarily within SA Objectives 4 (Natural Resources and Waste).

Key issues relating to soil

- ⇒ The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible.

Water

- N55. The water theme considers the implications of new development on water quality and quantity.
- N56. 'Water' has been considered in the SA assessments primarily within SA Objective 6 (Water).

Key issues relating to water

- ⇒ Waterbodies across the borough mostly range from 'poor' to 'moderate' Water Framework Directive status.
- ⇒ Most of the borough falls within a Nitrate Vulnerable Zone.
- ⇒ Water availability for extraction varies, with deficits in the water required to support the environment identified at the Meece Brook, meaning it is currently closed to further

4 Evolution of the environment without the Local Plan

- N57. The SEA Regulations requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"*.
- N58. In the absence of the Local Plan, no new plan-led development would occur within the borough other than that which is currently proposed in the adopted plan¹³. In this scenario, an 'appeal-led' system would predominate. The nature and scale of development that may come forward under an appeal-led system is uncertain. In a 'no plan' scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place, but there would not be an up-to-date planning framework to guide development in the Plan period 2020-2040.
- N59. **Table N.2** considers the likely evolution of the baseline within Newcastle-under-Lyme in the absence of the Local Plan. This takes into account information gathered at the Scoping stage as well as more up-to-date data and statistics.

Table N.1: Likely evolution without the Newcastle-under-Lyme Local Plan

Theme	Likely evolution without the Local Plan
Air	<ul style="list-style-type: none"> Current national trends suggest that NO₂ concentrations are declining in the borough's three AQMAs. 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. Traffic and congestion are likely to increase with population growth, with implications for air quality, residents and wildlife within 200m of busy roads. Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection. Biodiversity and wildlife sites will likely continue to benefit from the objectives and measures set out in the Staffordshire Biodiversity Action Plan including species action plans and habitat action plans to restore, protect, and enhance important features. There may be increased potential for negative impacts on biodiversity within locally designated sites which benefit from local planning policy framework.
Climatic factors	<ul style="list-style-type: none"> The frequency and severity of flooding is set to increase due to the impacts of climate change, in particular risk would expect to increase along the Lyme Brook.

¹³ Newcastle-under-Lyme Borough Council – Current development plan. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/current-development-plan> [Date accessed: 03/07/24]

Theme	Likely evolution without the Local Plan
	<ul style="list-style-type: none"> • The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the Plan area in the future. However, the high risk of surface water flooding in the borough's urban areas will likely continue to be an issue. The urban area of Newcastle and Kidsgrove has been identified in the Flood Risk Management Strategy as one of the top ten urban areas at risk of surface water flooding in the county. • Per capita emissions are likely to decrease over time as renewable energy increases its market share. • The Future Homes Standard will come into effect in 2025 and apply to all new developments, this will be accompanied by changes to Parts L (energy) and F (ventilation) of the Building Regulations. The Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems and high levels of energy efficiency. At the time of writing, it is understood that a full technical specification for the Future Homes Standard will be consulted on in 2023, with the necessary legislation introduced in 2024, ahead of implementation in 2025.
Cultural heritage	<ul style="list-style-type: none"> • Nationally designated heritage assets will continue to benefit from legislative protection. • Locally identified heritage assets would potentially be afforded less protection.
Human health	<ul style="list-style-type: none"> • The life expectancy of men and women is anticipated to rise over time. • Some residents will continue to need to travel relatively far, likely by driving, to reach important health facilities and services. However, this inequality may be addressed to some extent by the Local Transport Plan. • Some residents will continue to have poor accessibility to the cycle network and walking zones. However, this inequality may be addressed to some extent by the Local Transport Plan. • Health-related issues including obesity, diabetes, cardiovascular disease and liver disease will likely continue to rise aligning with current trends in the borough.
Landscape	<ul style="list-style-type: none"> • The Green Belt will continue to benefit from legislative protection. • The Borough will remain a predominantly rural and agricultural landscape. • There may be increased development pressure on the open countryside areas outside the Green Belt, particularly to the south of the borough.
Population and material assets	<ul style="list-style-type: none"> • The number of jobs in the borough is expected to increase, although at a slower rate than surrounding authorities. • The number of businesses is expected to increase at the current rate, comparatively slower than surrounding authorities. • There is an increasing lack of available supply of employment land to meet local and wider market demand. • House prices are expected to increase, as a result of slower housing stock growth than the West Midlands and national averages. • Less control is expected over the location of future housing, including increased pressure on areas of open countryside. • Provision of affordable and specialist housing is likely to be reduced, as well as an inability to better balance the housing market through the provision of more small homes.

Theme	Likely evolution without the Local Plan
	<ul style="list-style-type: none"> • Rates of deprivation are likely to continue to decline. • There may be fewer opportunities to enhance community benefits associated with plan-led housing proposals. • Less ability to refine the housing stock is expected to meet the changing demands of existing residents. This includes the provision of housing for the elderly. • The population of the borough is expected to continue to increase. This will place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • In the absence of development proposed in the Local Plan, there could potentially be a rise in homelessness due to an unmet housing need.
Soil	<ul style="list-style-type: none"> • Soil is a non-renewable resource that would continue to be lost. • Rates of soil erosion and loss of soil fertility are likely to continue to rise due to the impacts of agriculture and climate change.
Water	<ul style="list-style-type: none"> • Water demand may increase over time as the population grows. • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through relevant River Basin Management Plans (RBMPs), Water Resource Management Plans (WRMPs) and Catchment Abstraction Management Strategies (CAMS) in line with the Water Framework Directive.

5 SA methodology

The SA Framework

- N60. Taking into consideration the key issues identified above, an SA Framework was established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared.
- N61. SA Objectives and indicators can be revised as further baseline information is collected, and sustainability issues and challenges are identified, and are used in monitoring the implementation of the Plan.
- N62. The full SA Framework used throughout the SA process including indicators is presented in **Appendix A**, with a summary of the 12 SA Objectives shown in **Table N.3**. It should be noted that the order of SA Objectives does not infer any prioritisation.

Table N.2: SA Framework summary

No.	SA Objective	Relevance to SEA Regulations
1	Climate Change: 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.	Climatic factors
2	Air: To improve air quality, creating cleaner and healthier air.	Air
3	Biodiversity, Flora and Fauna: Protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity.	Biodiversity, Flora and Fauna
4	Natural Resources and Waste: To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources, ensure the efficient use of mineral resources and reduce waste.	Soil and Material Assets
5	Flooding: To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems (SuDS).	Water, Human Health and Material Assets
6	Water: To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive.	Water
7	Cultural Heritage: To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings.	Cultural Heritage Including Architectural and Archaeological Heritage
8	Landscape: To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.	Landscape
9	Health and Wellbeing: To increase life expectancy and improve the health and mental wellbeing of the population overall; and to maintain and enhance the quality, accessibility and connectivity of open space and blue-green infrastructure.	Human Health
10	Equality: To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, including availability of a warm, safe home are available to all sectors of the population with particular emphasis on deprived neighbourhoods.	Population

No.	SA Objective	Relevance to SEA Regulations
11	Transport and Accessibility: To reduce the need to travel while increasing transport choice including the promotion of safe and efficient public transport and active travel options at the heart of a transport network that provides accessibility for all.	Population and Climatic Factors
12	Economy: To protect and enhance the vitality and viability of centres and ensure the provision of a range of employment land and premises that meets the needs of the business community and provides retail opportunities for local communities.	Population

Significant effects

- N63. A single value from **Table N.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.
- N64. The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table N.3: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal will be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals will be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts will be positive or adverse.
Minor Positive +	<p>The size, nature and location of a development proposal is likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.

Significance	Definition (not necessarily exhaustive)
Major Positive ++	<p>The size, nature and location of a development proposal is likely to:</p> <ul style="list-style-type: none">• Enhance and redefine the location in a positive manner, making a contribution at a national or international scale;• Restore valued receptors which were degraded through previous uses; and/or• Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- N65. Limitations, assumptions and topic-specific methodologies applied in the SA are discussed in further detail within **Chapter 4** of the Regulation 19 SA Report (**Volume 2**) and **Appendix E (Volume 3)**.

6 Reasonable alternatives

Preface

- N66. The SEA Regulations state as part of the requirements for preparing an environmental report, that the local plan making process must identify, describe, and evaluate reasonable alternatives that have been considered.
- N67. There is no precise guide as to what constitutes a 'reasonable alternative'. NuLBC have identified reasonable alternatives for the Local Plan at different stages of the plan making process, including different types of reasonable alternatives, for example, different options to meet the required growth such as housing growth options, employment growth options, policies and reasonable alternative sites.
- N68. The SA has assessed reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is the Council's role to use the SA findings, alongside other evidence base material, to decide which sites to 'select' for allocation in the Local Plan and which to 'reject' from further consideration.
- N69. In the case of the Newcastle-under-Lyme Local Plan, all reasonable alternatives have been identified and described by the Council's plan makers. **Figure N.5** below outlines the definitions for the different types of reasonable alternatives assessed throughout the SA process.
- N70. **Figure N.6** summarises the reasonable alternatives considered throughout the plan-making process, and where these alternatives have been identified, described and evaluated.

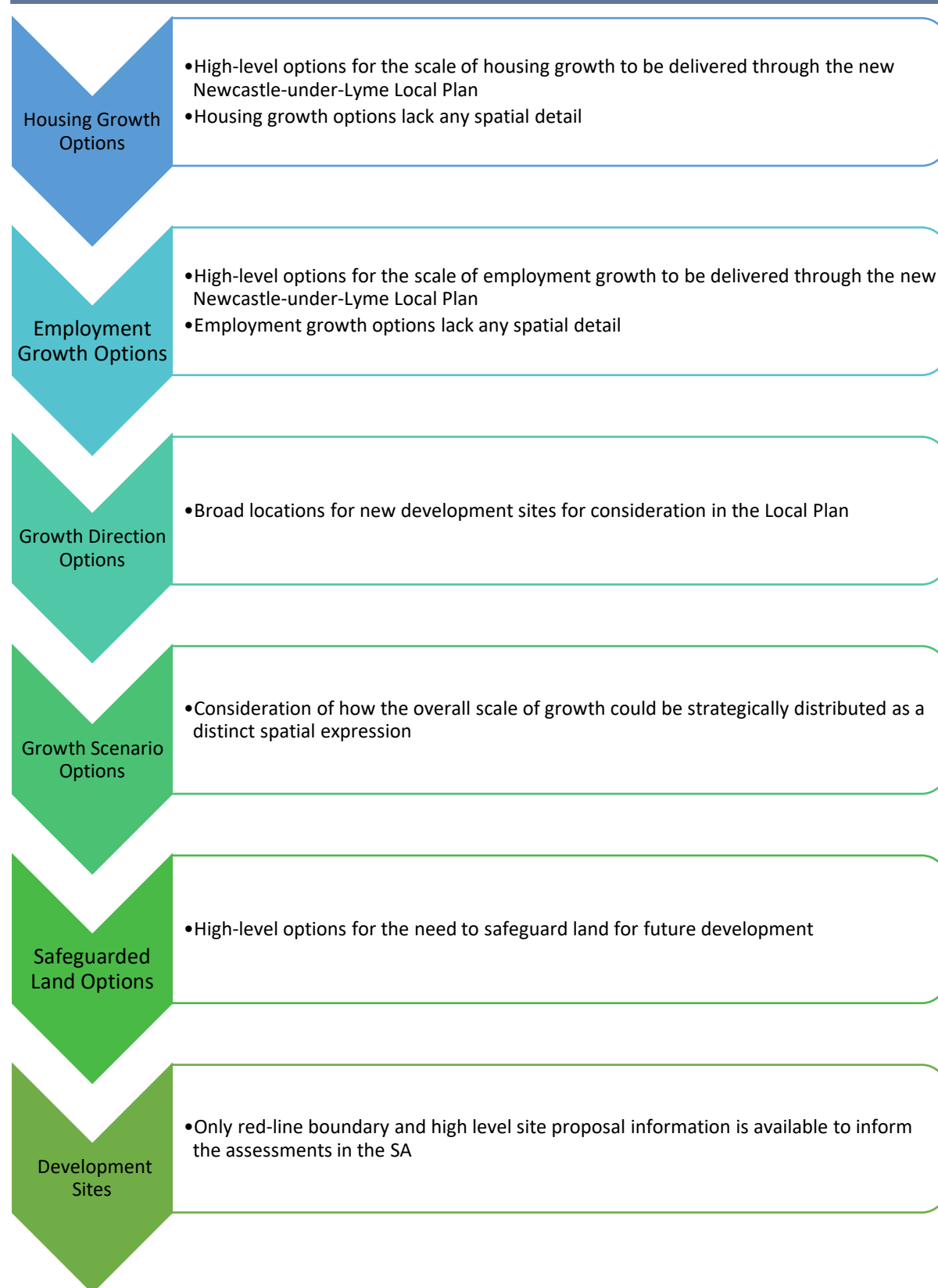


Figure N.5: Definitions for the different types of reasonable alternatives assessed in the SA process

Quick guide to reasonable alternatives

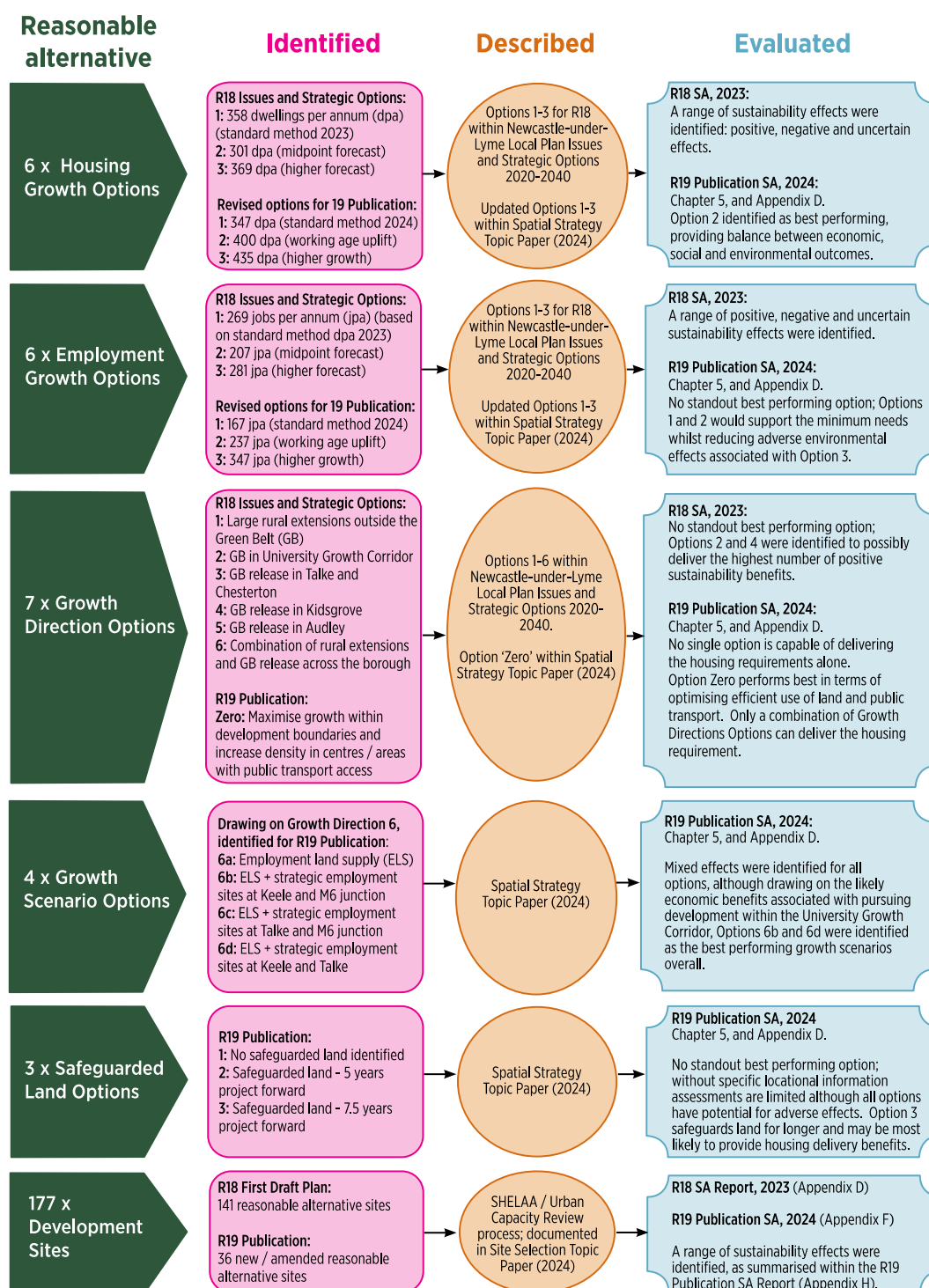


Figure N.6: The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process

Housing growth options

- N71. A total of three housing growth options were assessed within the Regulation 18 SA Report¹⁴, based on the numbers derived from the Housing and Economic Needs Assessment (HEDNA) Update (2023)¹⁵ for housing growth in the Newcastle-under-Lyme Borough for the Plan period. These three options related to variations on the standard method at the time of their evaluation, and modelled employment forecasts relating to population growth.
- N72. Following the information from a further HEDNA Update prepared in April 2024¹⁶, three updated housing options were identified by NuLBC due to concern that the standard method figure will not provide enough homes to align with the latest employment growth forecasts for the Plan period. These three options meet or exceed the identified need, based on the latest standard method figure and modelled employment forecasts.
- N73. According to the updated HEDNA (2024), the current housing need figure for Newcastle-under-Lyme is 347 homes per year. This means that a total housing need of 6,940 homes was required to be met for the Plan period (2020 to 2040) at the time of assessment.
- N74. The three reasonable alternative options for the quanta of housing growth identified by NuLBC at this stage of the plan making process, following on from the three options considered at the Regulation 18 stage, are presented in **Table N.4**.

Table N.4: Newcastle-under-Lyme Housing Growth Options identified by NuLBC at the Regulation 19 stage

Housing growth option	Dwellings per annum	Total dwelling requirement 2020-2040
1. Standard Method	347	6,940
2. Standard Method plus uplift for working age population	400	8,000
3. Higher growth option	435	8,700

- N75. **Table N.5** presents high-level summary assessment scores which seek to illustrate the sustainability performance of each housing growth option. Further details of the assessment results are presented in the **Appendix D** of this report.

Table N.5: Impact matrix of the three housing growth options identified by NuLBC at the Regulation 19 stage

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Housing Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	--	-	-	-	+/-	-	+/-	-	-	+	-	+

¹⁴ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/24]

¹⁵ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

¹⁶ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Housing Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
2	--	-	-	-	+/-	-	+/-	-	-	++	-	+
3	--	-	-	-	+/-	-	+/-	-	-	++	-	+

N76. Option 2 has been identified as the best performing overall, seeking to provide the best balance between economic, social and environmental outcomes, through ensuring housing growth aligns with the economic and employment growth forecasts in contrast to Option 1, but providing a lower quantum of growth than Option 3 and thus reducing environmental impacts.

Employment growth options

N77. A total of three employment growth options were assessed within the Regulation 18 SA Report¹⁷, based on the numbers derived from the HEDNA Update (2023)¹⁸ for employment growth in the Newcastle-under-Lyme Borough for the Plan period. These three options related to different modelled employment forecasts based on variations on the standard housing method at the time of their evaluation.

N78. Following the information from a further HEDNA Update prepared in April 2024¹⁹, three updated employment growth options were identified by NuLBC due to concern that the standard method figure will not support a large enough working population to align with the latest employment growth forecasts for the Plan period. These three options meet or exceed the identified need based on the latest standard method figure and modelled employment forecasts.

N79. According to the updated HEDNA (2024), the borough's employment land supply as of March 2023 has now reduced to 48ha. The updated scenarios presented within the HEDNA indicate a likely requirement for between 43 and 83ha of employment land for the Local Plan period to 2040.

N80. The three reasonable alternative options for the quanta of employment growth identified by NuLBC at this stage of the plan making process, following on from the three options considered at the Regulation 18 stage, are presented in **Table N.6**.

Table N.6: Newcastle-under-Lyme employment growth options identified by NuLBC at the Regulation 19 stage

¹⁷ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/24]

¹⁸ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

¹⁹ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/> [Date accessed: 04/07/24]

Employment growth option	Need	Supply (ha)	Job growth supported per annum
1. Standard Method	43ha	48ha	167 jobs
2. Standard Method plus uplift for working age population	63-83ha	48ha	237 jobs
3. Higher growth option	83ha	48ha	347 jobs

N81. **Table N.7** presents summary assessment scores which seek to illustrate the sustainability performance of each employment growth option. Further details of the assessment results are presented in the **Appendix D**.

Table N.7: Impact matrix of the three employment growth options identified by NuLBC at the Regulation 19 stage

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Employment Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	-	-	-	-	+/-	-	+/-	-	0	+	-	++
2	-	-	-	-	+/-	-	+/-	-	0	+	-	++
3	-	-	-	-	+/-	-	+/-	-	0	+	-	++

N82. All three employment growth options are based on the same employment land supply figure of 48ha, based on the latest HEDNA evidence, but propose differing employment need figures ranging between 43ha and 83ha. The three options perform similarly against the high-level SA scoring system, and all will support the creation of at least 167 jobs per annum which equates to the job growth associated with the minimum actual need for 347 homes (based on the standard housing method calculation).

N83. There are a number of uncertain variables associated chiefly with size, nature and location which limit the ability of the SA to make firm conclusions with respect of several environmental variables. However, in terms of social and economic benefits, it is likely that Option 3 will deliver the highest level of sustainability performance with its ability to deliver the highest potential job growth.

Growth direction options

N84. A total of seven growth direction options were identified by NuLBC and evaluated in the SA process. These seven options aim to relate the spatial strategy (as outlined in the Issues and Strategic Options document²⁰) to the hierarchy of centres, and link to potential broad locations for strategic development sites around key locations in the borough.

²⁰ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 01/06/24]

- N85. Given the challenges in identifying sufficient land for significant growth within the development boundaries, the Council sought to explore the potential of land adjacent to existing settlements to be developed as an urban or rural extension, which will be likely to accommodate at least 1,000 dwellings. These expansions are reflected within the growth direction options.
- N86. A total of six growth direction options have been evaluated in the Regulation 18 SA Report²¹. Following this, a further 'Growth Direction Option Zero' has been evaluated at the Regulation 19 stage. Growth Direction Option Zero was identified at the Issues and Options (2022)²² stage as a source of land for development, and has now subsequently been incorporated into assessments to assist in understanding the evolution of the growth direction options. All seven options are presented in **Table N.8** below.

Table N.8: Newcastle-under-Lyme growth direction options identified by NuLBC

Growth Direction Option	Local Plan stage	Description of growth direction option
Growth Direction 0	Regulation 19	Maximising development in development boundaries.
Growth Direction 1	Regulation 18	Development on strategic sites outside the Green Belt – Large rural extensions
Growth Direction 2	Regulation 18	Strategic Green Belt release for an urban extension – University Growth Corridor
Growth Direction 3	Regulation 18	Green Belt release for development of strategic sites – Talke and Chesterton expansion
Growth Direction 4	Regulation 18	Green Belt release for development of strategic sites – Kidsgrove expansion
Growth Direction 5	Regulation 18	Green Belt release for development of strategic sites – Audley Rural expansion
Growth Direction 6	Regulation 18	Combination of strategic sites across the borough comprising of both sites outside the Green Belt and sites which require Green Belt release

- N87. **Table N.9** presents summary assessment scores which seek to illustrate the sustainability performance of each employment growth option. Further details of the assessment results are presented in the Regulation 18 SA Report (2023)²³ and **Appendix D** of this report.

²¹ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/24]

²² Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 01/06/24]

²³ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 03/07/24]

Table N.9: Impact matrix of the six growth direction options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Growth Direction Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
0	-	-	-	+	+/-	-	-	-	+	+	+	+
1	--	--	-	--	-	-	-	+	-	-	-	-
2	+	+/-	-	-	0	-	-	--	+	+	+	+
3	-	-	+/-	+	0	-	-	--	+	+	+/-	+
4	-	+/-	-	+	0	-	-	--	+	+	+	+
5	--	-	-	-	-	-	-	--	-	-	-	-
6	-	-	-	+/-	+/-	-	+/-	-	-	+/-	+/-	+/-

- N88. The summary performance values in **Table N.9** show that Option 6 is associated with uncertainty as a result of the distributed nature of the potential locations for growth direction. The option has the potential to perform well but lacks definition.
- N89. Options 2 or 4 may deliver a high number of positive sustainability benefits. Whilst these options would utilise undeveloped land they provide easy access into Newcastle-under-Lyme town with potential for existing public transport links with the university to be utilised. There is potential for employment opportunities associated with the University Growth Corridor and there are other nearby existing infrastructure and amenities which could be incorporated into or built upon by this option, including renewable energy schemes.
- N90. In respect to efficient use of land, access to local services and encouraging public transport, Growth Direction Option Zero is likely to perform better than Options 1-6 as a large proportion of development is likely to be located within existing development boundaries. However, uncertainty remains in regard to the capacity of services and infrastructure to deal with the expected growth and will not meet the needs alone, relying on Duty to Co-operate (DtC) contributions from neighbouring authorities.

Growth scenario options

- N91. Following the six growth direction options identified by the Council at the Regulation 18 stage and an additional growth direction option at the Regulation 19 stage, NuLBC have identified four 'growth scenarios'. These underpin Growth Direction Option 6 which has been selected by the Council at the Regulation 18 stage.
- N92. The purpose of the 'growth scenarios', as set out in **Table N.10**, is to explore further alternatives based around new proposed employment allocations including strategic employment sites.

Table N.10: Newcastle-under-Lyme Growth Scenario Options identified by NuLBC

Growth scenario option	Employment land supply	Strategic employment sites	Gross employment land supply
Growth Scenario 6a	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> No strategic sites. 	69.6ha
Growth Scenario 6b	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) KL15 Land South of A525 between Keele University and Newcastle (13ha) 	104.6ha
Growth Scenario 6c	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) TK30 Land off Talke Road and A500, Talke (51ha) 	142.6ha
Growth Scenario 6d	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> KL15 Land South of A525 between Keele University and Newcastle (13ha) TK30 Land off Talke Road and A500, Talke (51ha) 	133.6ha

N93. **Table N.11** presents summary assessment scores which seek to illustrate the sustainability performance of each growth scenario option. Further details of the assessment results are presented in the **Appendix D**.

Table N.11: Impact matrix of the four Growth Scenario Options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Growth Scenario Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
6a	0	-	-	-	-	0	-	-	0	+	0	+
6b	-	-	-	-	-	-	-	-	0	++	-	++
6c	-	-	-	-	-	-	-	-	0	+	-	++
6d	-	-	-	-	-	0	-	-	0	++	-	++

N94. All options will support the creation of employment opportunities, therefore scoring positively against SA Objectives 10 (equality) and 12 (economy). When compared to the other options, Option 6a performs slightly worse with regard to the creation of employment opportunities (SA Objective 12), falling slightly short of the 83ha of employment land requirement identified within the HEDNA. Options 6b and 6d will provide additional

benefits in regard to employment opportunities as a result of the higher level of growth, including within the University of Keele Growth Corridor, and are therefore identified as better performing options than 6a and 6c under SA Objective 10 (equality).

- N95. The large quantum of growth proposed under all four options will have potential adverse effects across several SA Objectives, as a result of the loss of previously undeveloped land with implications for ecological networks and landscape settings, reduction in air quality associated with new growth, possible exacerbation of flood risk, and changes to the setting of heritage assets (SA Objectives 2, 3, 4, 5, 7 and 8). The development under Options 6b and 6d is likely to have greater potential for adverse effects on water quality (SA Objective 6), as a result of the location of the proposed development within groundwater SPZ 3, although it is acknowledged that all options may give rise to increased risks of water pollution in general.
- N96. Although Option 6c has the potential to deliver the highest quantum of employment floorspace, Options 6b and 6d will support development within the University of Keele Growth Corridor, with associated benefits for employment skills and training opportunities. As such, Options 6b and 6d are identified as the best performing overall.

Safeguarded land options

- N97. In March 2024, NuLBC commissioned Arup to prepare additional Green Belt evidence to accompany their emerging Local Plan. Following on from the Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1 (2017)²⁴ and Part 2 (2020)²⁵, and Part 3 of the Green Belt Assessment²⁶ (which included advice of safeguarded land), the further Safeguarded Land Advice (2024)²⁷ explored whether it is necessary and how to determine the quantum and location of safeguarded land.
- N98. NuLBC identified three options regarding the safeguarding of land, set out in **Table N.12**.
- N99. The location of new development under the 'no safeguarded land' scenario within Option 1 is unknown, and to some extent so is the location of development under Options 2 and 3, although it is expected that safeguarded land under Options 2 and 3 will be located in accordance with the requirements within the NPPF (paragraph 148)²⁸ where it states that when defining Green Belt boundaries plans should *"where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet long-term development needs stretching well beyond the plan period"*.

Table N.12: Newcastle-under-Lyme Safeguarded Land Options identified by NuLBC

²⁴ Arup (2017) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1, November 2017. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 11/06/24]

²⁵ Arup (2020) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 2, December 2020. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 11/06/24]

²⁶ Arup (2023) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 3, June 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 11/06/24]

²⁷ Arup (2024) Green Belt Safeguarded Land Advice, Draft – 13 May 2024.

²⁸ DLUHC (2023) National Planning Policy Framework, December 2023. Paragraph 148. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 12/06/24]

Safeguarded land option	Associated housing growth	Additional information
1. Safeguarded Land – None identified	0	This option is not to identify safeguarded land. This option is informed by factors suggesting it may not be necessary to identify safeguarded land.
2. Safeguarded Land – 5 years project forward	1,561.5 – 1,800 dwellings	<ul style="list-style-type: none"> Projecting forward 5 years of development requirement (for housing only) The range represents the standard method calculation outcome of 347 (lower) and then the 400 housing requirement figure (higher) The range also includes a reduction of 10% as outlined in the attached report
3. Safeguarded Land – 7.5 years project forward	2,342.25 – 2,700 dwellings	<ul style="list-style-type: none"> Projecting forward 7.5 years of development requirement (for housing only) The range represents the standard method calculation outcome of 347 (lower) and then the 400 housing requirement figure (higher) The range also includes a reduction of 10% as outlined in the attached report

N100. **Table N.13** presents summary assessment scores which seek to illustrate the sustainability performance of each safeguarded land option. Further details of the assessment results are presented in the **Appendix D**.

Table N.13: *Impact matrix of the three Safeguarded Land Options*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Safeguarded Land Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	--	+/-	-	+/-	+/-
2	-	-	-	-	+/-	-	+/-	-	-	+	-	-
3	-	-	-	-	+/-	-	+/-	-	-	+	-	-

N101. Options 2 and 3 perform similarly against the high-level SA scoring system. Both will increase the future housing land supply which is expected to provide a greater mix of housing types including affordable housing, with Option 3 likely performing better overall given it would safeguard land for a longer period of time. However, Options 2 and 3 are likely to result in adverse effects on environmental objectives to some extent, owing to the loss of undeveloped land. All three options are identified to result in adverse effects on the surrounding landscape as a result of the undeveloped, rural nature of the development, although Option 1 is more likely to give rise to significant adverse effects on the landscape when compared to Options 2 and 3, as a result of the higher probability of Green Belt release under Option 1.

N102. There is greater uncertainty with regard to the location and nature of development included within Option 1 and this has resulted in uncertain impacts being identified across

the majority of SA Objectives. Without safeguarding land, there is less certainty regarding the future development pattern, and there will potentially be higher reliance on windfall developments, and increased pressure for development in less sustainable locations further from existing centres.

- N103. Further assessment will be needed to provide clarity in this evaluation as the relative sustainability performance will depend on the specific location of the land to be safeguarded under Options 2 and 3, which is unknown at present.

Evaluation of reasonable alternative sites

- N104. A total of 177 reasonable alternative sites have been identified, described and evaluated throughout the Plan and SA process.
- N105. As the preparation of a Local Plan is an iterative process, the Council has undertaken several consultations on the sites received through the Call for Sites process: the principal means of identifying reasonable alternatives. As a result of this, further site assessment work has been undertaken at the Regulation 19 stage to consider new reasonable alternative sites as and when they emerged.
- N106. All reasonable alternative sites have been evaluated against the same methodology (as set out in **Appendix E**), and have been assessed before and after Local Plan policy mitigation is applied (see **Appendix H**).
- N107. The SA assessments of the 177 reasonable alternative sites identified positive, negligible, minor negative and major negative impacts for the SA Objectives. The pre-mitigation SA findings are replicated in **Table N.14**.
- N108. The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network.
- N109. The pre-mitigation SA assessments identified positive impacts in relation to the provision of new housing and employment floorspace, as well as being located within sustainable distance to local bus services and public greenspaces; in addition, potential for provision of low and zero carbon (LZC) technologies, provision of waste management and recycling; and coinciding with Flood Zone 1 where fluvial flood risk is low.

Table N.14: *Summary of pre-mitigation reasonable alternative site assessments (extracted from **Appendix H**)*

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB2	R18	+	-	-	--	--	-	0	--	-	0	-	++
AB2	R19	+	-	-	--	--	-	0	--	-	++	-	++
AB4	R18	+	-	-	-	+	-	0	--	-	++	-	+
AB12	R18	-	0	-	-	-	+/-	0	--	-	++	-	0
AB15	R18	+/-	0	+/-	-	-	+/-	0	--	-	+	-	0
AB16	R18	-	0	-	--	--	+/-	-	--	--	++	-	0
AB22	R18	+	0	-	-	--	+/-	0	--	-	++	-	0
AB24	R19	+	0	-	-	+	-	0	--	-	+	-	0
AB27	R18	+	0	-	-	+	+/-	0	-	-	+	-	0
AB30	R18	+	0	-	-	-	+/-	0	--	-	++	-	+
AB32	R18	+	0	-	-	-	+/-	-	--	-	+	-	0
AB33	R18	-	0	+/-	-	--	+/-	-	--	-	+	-	0
AB34	R18	-	0	-	-	+	-	0	--	-	++	-	0
AB37	R18	-	0	--	-	--	-	-	--	-	++	-	0
AB72	R18	+	0	-	-	+	+/-	0	--	-	+	-	0
AB73	R18	+	0	-	-	+	+/-	0	--	-	+	-	0
AB75	R18	+	0	-	-	--	+/-	0	--	-	++	-	+
AB77	R18	+	0	-	--	-	-	-	--	-	++	-	++
AB78	R18	+	-	+/-	-	-	-	-	--	-	+	-	0
AB79	R18	+	0	-	-	--	-	-	--	-	++	-	0
HD26	R18	+	0	-	-	-	+/-	0	-	-	+	-	-
HM8	R18	+/-	-	-	-	-	+/-	0	--	-	++	-	0
HM10	R18	+/-	0	-	-	-	+/-	0	--	-	+	-	0
HM15	R18	+	0	--	-	+	+/-	0	-	-	+	-	0
HM20	R19	+	0	-	-	-	+/-	0	--	-	+	-	0
HM22	R18	+	0	-	-	+	+/-	0	--	-	+	-	0
HM23	R19	+	0	-	-	+	+/-	0	--	-	+	-	0
HM62	R19	+/-	0	-	-	-	+/-	0	--	-	+	-	0
HM63	R19	+	0	+/-	-	+	+/-	0	--	-	+	-	0
HM66	R18	+	0	-	-	--	+/-	0	--	-	+	-	0
CL6	R18	+/-	0	+/-	-	-	+/-	0	+	-	+	-	0
CL8	R18	+	-	-	-	-	+/-	-	--	-	+	-	0
SB12	R18	+/-	-	-	++	+	+/-	-	-	-	+	-	0
CT1	R18	+	-	-	-	-	+/-	0	-	-	++	-	0
CT1	R19	+	-	-	-	-	+/-	0	-	-	++	-	0
CT10	R18	+/-	0	--	-	-	+/-	0	-	--	++	-	+
CT20	R18	+/-	0	--	-	-	+/-	0	-	-	0	-	+
CT21	R19	+/-	0	-	-	-	+/-	0	+	-	+	-	0
CT25	R18	+	0	-	-	+	+/-	-	--	-	++	-	0
HD10	R19	+	0	--	-	--	+/-	0	-	--	0	-	+
CH3	R18	-	0	+/-	++	-	+/-	0	-	--	++	-	0
CH13	R18	+/-	0	+/-	-	--	+/-	0	+	--	-	-	0
CH14	R18	-	0	+/-	+	-	+/-	0	+	-	-	-	-

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS3	R18	-	0	-	-	--	+/-	0	-	-	++	-	0
KS11	R18	+/-	0	+/-	-	+	+/-	0	+	-	-	-	-
KS17	R18	-	0	+/-	-	-	+/-	0	-	-	+	-	-
KS18	R18	+/-	0	+/-	-	+	+/-	0	+	-	+	-	0
KS19	R18	+/-	0	-	-	+	+/-	0	+	-	-	-	0
WS9	R19	-	-	-	-	-	+/-	0	-	-	+	-	0
KL9	R18	+	-	-	-	-	+/-	-	--	-	++	-	0
KL12	R18	+/-	-	--	-	+	+/-	-	--	-	+	-	0
KL13	R18	+	-	--	--	--	+/-	--	--	-	++	-	+/-
KL14	R18	+	0	--	--	-	+/-	--	--	-	+	-	+/-
KL15	R18	+	-	-	-	-	+/-	-	--	-	++	-	++
KL20	R18	+	-	-	-	+	+/-	0	--	-	+	-	0
KL21	R18	+	-	-	--	-	+/-	-	--	-	++	-	++
KL22	R19	+	-	-	-	+	+/-	0	--	-	+	-	0
KL33	R18	+	0	+/-	++	+	+/-	-	--	-	+	-	0
KL34	R18	+	0	-	-	-	+/-	-	--	-	++	-	0
BL31	R19	+	-	-	-	--	+/-	-	--	-	+	-	+/-
KG6	R18	+/-	-	+/-	-	--	+/-	0	+	-	+	-	0
KG26	R18	+/-	0	+/-	-	+	+/-	0	+	-	+	-	0
RC4	R18	+/-	-	+/-	-	--	+/-	-	+	-	+	-	0
RC8	R18	+/-	-	--	-	--	+/-	0	+	-	+	++	0
RC11	R19	+	-	--	-	--	+/-	-	-	-	++	-	0
LW14	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW23	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW27	R18	+/-	0	+/-	-	+	-	0	--	-	+	-	0
LW29	R18	+/-	0	-	-	+	-	0	--	-	+	-	0
LW30	R18	+/-	0	-	-	+	-	0	--	-	+	-	0
LW41	R18	+/-	0	-	-	-	+/-	0	--	-	+	-	0
LW49	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW53	R18	+/-	0	-	-	+	-	0	--	-	++	-	0
LW54	R18	+/-	-	--	-	--	-	-	--	-	++	-	0
LW81	R18	+/-	0	-	-	+	-	-	--	-	+	-	0
LW82	R18	+/-	0	--	-	--	-	0	--	-	+	-	0
LW87	R18	+/-	-	-	-	+	+/-	0	--	-	+	-	-
HM4	R18	+/-	-	-	-	-	+/-	-	--	-	+	-	0
HM7	R19	+/-	-	-	-	-	+/-	-	--	-	+	-	0
HM28	R18	+/-	-	-	-	+	+/-	-	--	-	+	-	0
HM29	R18	+/-	-	-	-	+	+/-	-	--	-	+	-	0
MD2	R18	+	-	-	-	+	+/-	0	-	-	+	-	-
MD5	R18	+/-	-	-	-	--	+/-	0	-	--	+	-	0
MD11	R18	+	0	--	-	--	+/-	0	-	-	+	-	+/-
MD12	R18	+	-	--	-	--	+/-	-	-	-	++	-	++
MD13	R18	+	0	-	-	--	+/-	-	--	-	++	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
MD18	R18	+	0	-	-	--	+/-	-	--	-	+	-	0
MD19	R18	+	0	-	-	-	+/-	-	--	-	+	-	0
MD20	R18	+	-	-	--	--	+/-	-	--	-	++	-	+/-
MD25	R18	+/-	-	-	-	--	+/-	-	-	-	+	-	0
MD29	R18	+/-	-	-	-	--	+/-	-	-	-	+	-	0
MD29	R19	+/-	-	-	-	--	+/-	-	-	-	++	-	0
MD30	R18	+/-	-	-	-	-	+/-	0	-	-	+	-	0
MD32	R18	+/-	0	-	-	--	+/-	0	-	-	+	-	0
MD33	R18	+/-	-	-	-	-	+/-	-	-	-	++	-	0
MD34	R18	+	0	-	-	+	+/-	0	-	-	+	-	0
MD39	R18	+/-	-	-	-	+	+/-	-	-	-	+	-	0
MD40	R18	+/-	0	-	-	+	-	0	-	-	++	-	0
MD56	R18	+	-	--	-	-	+/-	-	-	-	+	-	0
LW6	R18	+/-	-	--	-	-	-	0	--	-	++	-	+
LW7	R18	+	-	-	-	+	+/-	-	--	-	+	-	0
LW9	R18	+/-	-	+/-	-	+	-	-	--	-	+	-	0
LW24	R19	+/-	0	-	+	+	-	0	--	-	+	-	0
LW38	R18	+/-	-	-	-	+	-	-	--	-	+	-	0
LW42	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW48	R18	+/-	-	--	-	+	-	0	--	-	++	-	0
LW74	R18	+/-	-	-	-	+	-	-	--	-	+	-	-
LW78	R18	+/-	-	-	-	+	-	-	--	-	+	-	0
LW83	R18	+/-	0	+/-	-	-	+/-	0	-	-	+	-	0
LW84	R18	+/-	-	+/-	-	+	-	-	--	-	+	-	0
LW86	R18	+/-	-	-	-	+	-	-	--	-	+	-	+/-
LW91	R19	+/-	0	+/-	-	-	+/-	-	--	-	++	-	0
NC5	R19	+	0	-	-	-	+/-	0	-	-	++	-	0
NC13	R18	+	0	-	-	--	+/-	0	-	-	+	-	0
NC77	R18	+	-	-	-	--	+/-	-	--	-	+	-	+
NC78	R18	+	-	-	-	--	+/-	-	--	-	++	-	0
NC80	R18	+	0	-	-	-	+/-	-	--	-	++	-	0
NC81	R18	+	0	-	-	-	+/-	0	--	-	+	-	0
NC83	R18	+	0	-	-	--	+/-	0	-	-	+	-	0
SP2	R18	+/-	0	-	-	+	+/-	0	-	-	++	-	-
SP11	R18	+	-	--	-	-	+/-	-	--	-	+	-	-
SP11(1)	R19	+	-	-	-	-	+/-	-	--	-	++	-	+/-
SP11(2)	R19	+	-	--	-	-	+/-	-	--	-	++	-	+/-
SP11(3)	R19	+	0	-	-	-	+/-	-	--	-	++	-	+/-
SP11(4)	R19	+	0	-	-	+	+/-	-	--	--	++	-	+/-
SP12	R18	+	0	-	-	+	+/-	0	--	-	++	-	0
SP14	R18	+	-	--	-	-	+/-	-	--	-	+	-	0
SP22	R18	+/-	0	+/-	-	--	+/-	-	+	-	++	-	0
SP23	R18	+	-	-	-	+	+/-	-	--	-	0	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SP23	R19	+	-	--	-	+	+/-	-	--	-	++	-	0
BW1	R19	+	-	-	-	--	+/-	0	-	-	++	-	+
BL3	R18	+/-	-	--	-	--	+/-	--	-	-	++	-	0
BL4	R19	+/-	-	--	-	--	+/-	-	-	-	+	-	0
BL8	R18	+/-	0	-	-	--	+/-	0	-	-	++	-	+
BL18	R18	-	-	--	-	--	+/-	0	-	-	+	++	0
BL18	R19	-	-	--	-	--	+/-	0	-	-	0	++	0
BL24	R18	+/-	-	+/-	-	--	+/-	0	+	-	+	-	0
BL32	R18	+/-	-	-	-	--	+/-	0	-	-	+	-	+
TK6	R18	-	0	+/-	-	--	+/-	0	-	-	++	-	0
TK10	R18	+	0	-	-	+	+/-	-	--	-	+	-	0
TK17	R18	+	-	-	-	-	+/-	-	-	-	++	-	0
TK18	R18	+	-	--	-	--	-	0	-	-	+	-	++
TK24	R18	+	0	-	-	--	+/-	-	-	-	++	-	0
TK25	R18	+	0	--	-	-	+/-	-	--	-	+	-	++
TK27	R18	+	0	-	-	-	+/-	-	-	-	+	-	0
TK29	R19	+	-	-	-	-	+/-	0	-	-	++	-	0
TK30	R18	+	-	--	-	--	+/-	-	-	-	0	-	++
TK45	R18	+	-	--	-	-	+/-	0	--	--	++	-	+
TK46	R18	+	-	--	-	--	-	0	--	-	0	-	0
TK47	R18	+	-	--	--	-	+/-	0	--	-	+	-	++
TB6	R18	+/-	-	+/-	-	+	+/-	0	+	-	++	-	0
TB19	R18	+	-	--	--	--	+/-	-	--	-	++	-	++
TB23	R18	+/-	-	-	-	--	+/-	0	-	-	+	-	0
TB24	R18	+/-	-	--	-	+	+/-	0	--	-	+	-	0
MB12	R18	+/-	-	+/-	-	+	+/-	0	-	++	+	-	0
MB13	R18	+/-	-	-	+	+	+/-	-	+	++	+	-	0
MB15	R18	+/-	-	+/-	+	+	+/-	-	+	++	+	-	0
TC7	R18	-	-	+/-	-	-	+/-	-	+	++	+	-	+
TC19	R19	+/-	-	+/-	-	+	+/-	-	+	++	+	-	-
TC20	R19	+/-	-	+/-	-	+	+/-	-	+	++	+	-	+/-
TC22	R18	+/-	-	+/-	-	+	+/-	-	+	++	+	-	+
TC40	R18	+/-	-	+/-	-	+	-	0	+	++	0	-	0
TC45	R18	+/-	-	-	-	-	+/-	-	+	++	+	-	+/-
TC50	R19	+/-	-	+/-	++	+	+/-	-	+	++	+	-	+/-
TC52	R19	+/-	-	+/-	-	-	+/-	-	+	++	++	-	+/-
TC71	R19	+/-	-	+/-	-	+	+/-	-	+	++	+	-	-
Site 1	R18	+/-	-	--	-	+	-	0	-	-	+	-	0
Site 2	R18	+/-	0	--	-	-	+/-	0	-	-	+	-	0
Site 3	R18	+	0	-	-	--	+/-	0	--	-	+	-	0
Site 4	R18	+/-	0	--	-	-	+/-	0	-	--	+	-	0
Site 5	R18	+	-	-	-	+	+/-	-	--	--	+	-	0
Site 6	R18	+/-	-	--	-	--	+/-	0	+	--	+	++	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
Site 7	R18	+/-	-	+/-	-	+	+/-	0	-	-	+	-	0
Site 8	R19	+/-	0	-	-	-	+/-	0	-	-	+	-	0
Site 9	R19	+/-	0	--	-	--	-	0	-	++	+	-	0
Site 10	R19	+/-	0	-	-	--	+/-	0	-	--	+	-	0
Site 11	R19	+/-	-	-	-	--	-	-	+	-	++	++	+/-

Post-mitigation assessments of reasonable alternative sites

N110. The post-mitigation assessments of all reasonable alternative sites have identified impacts through considering the likely mitigation effects of the Local Plan policies. **Appendix H** presents a detailed post-mitigation evaluation, with the summary scores presented in **Table N.15**.

Table N.15: Summary of post-mitigation reasonable alternative site assessments (extracted from **Appendix H**)

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB2	R18	+	-	-	--	0	0	0	--	-	0	-	++
AB2	R19	+	-	-	--	0	0	0	--	-	++	-	++
AB4	R18	+	-	+/-	-	+	0	0	--	-	++	-	+
AB12	R18	0	0	+/-	-	+	0	0	--	-	++	-	0
AB15	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
AB16	R18	0	0	-	--	+	0	0	--	-	++	-	0
AB22	R18	+	0	+/-	-	+	0	0	--	-	++	-	0
AB24	R19	+	0	-	-	+	0	0	--	-	+	-	0
AB27	R18	+	0	-	-	+	0	0	-	-	+	-	0
AB30	R18	+	0	+/-	-	+	0	0	--	-	++	-	+
AB32	R18	+	0	-	-	+	0	0	--	-	+	-	0
AB33	R18	0	0	+/-	-	+	0	0	--	-	+	-	0
AB34	R18	0	0	-	-	+	0	0	--	-	++	-	0
AB37	R18	0	0	--	-	0	0	0	--	-	++	-	0
AB72	R18	+	0	-	-	+	0	0	--	-	+	-	0
AB73	R18	+	0	-	+	+	0	0	--	-	+	-	0
AB75	R18	+	0	+/-	-	+	0	0	--	-	++	-	+
AB77	R18	+	0	-	--	0	0	0	--	-	++	-	++
AB78	R18	+	-	+/-	-	+	0	0	--	-	+	-	0
AB79	R18	+	0	+/-	-	+	0	0	--	-	++	-	0
HD26	R18	+	0	+/-	+	+	0	0	--	-	+	-	0
HM8	R18	+/-	-	-	-	+	0	0	--	-	++	-	0
HM10	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HM15	R18	+	0	--	++	+	0	0	-	-	+	-	0
HM20	R19	+	0	+/-	++	+	0	0	--	-	+	-	0
HM22	R18	+	0	-	++	+	0	0	-	-	+	-	0
HM23	R19	+	0	+/-	++	+	0	0	--	-	+	-	0
HM62	R19	+/-	0	+/-	++	+	0	0	--	-	+	-	0
HM63	R19	+	0	+/-	++	+	0	0	--	-	+	-	0
HM66	R18	+	0	-	-	+	0	0	--	-	+	-	0
CL6	R18	+/-	0	+/-	++	+	0	0	+	-	+	-	0
CL8	R18	+	-	-	-	+	0	0	--	-	+	-	0
SB12	R18	+/-	-	-	++	+	0	0	+	-	+	-	0
CT1	R18	+	-	+/-	++	+	0	0	-	-	++	-	0
CT1	R19	+	-	+/-	++	+	0	0	-	-	++	-	0
CT10	R18	+/-	0	--	++	+	0	0	+	-	++	-	+
CT20	R18	+/-	0	--	++	+	0	0	-	-	0	-	+
CT21	R19	+/-	0	-	+	+	0	0	+	-	+	-	0
CT25	R18	+	0	-	+	+	0	0	--	-	++	-	0
HD10	R19	+	0	--	++	0	0	0	-	-	0	-	+
CH3	R18	0	0	+/-	++	+	0	0	-	-	++	-	0
CH13	R18	+/-	0	+/-	+	0	0	0	+	-	0	-	0
CH14	R18	0	0	+/-	+	+	0	0	+	-	+	-	0
KS3	R18	0	0	+/-	+	+	0	0	+	-	++	-	0
KS11	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
KS17	R18	0	0	+/-	+	+	0	0	+	-	+	-	0
KS18	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
KS19	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
WS9	R19	0	-	-	++	+	0	0	+	-	+	-	0
KL9	R18	+	-	-	++	+	0	0	--	-	++	-	0
KL12	R18	+/-	-	--	-	+	0	0	--	-	+	-	0
KL13	R18	+	-	--	--	+	0	0	--	-	++	-	0
KL14	R18	+	0	-	--	+	0	0	--	-	+	-	0
KL15	R18	+	-	+/-	-	+	0	0	--	-	++	-	++
KL20	R18	+	-	-	++	+	0	0	--	-	+	-	0
KL21	R18	+	-	+/-	--	+	0	0	--	-	++	-	++
KL22	R19	+	-	-	-	+	0	0	--	-	+	-	0
KL33	R18	+	0	+/-	++	+	0	0	--	-	+	-	0
KL34	R18	+	0	-	-	+	0	0	--	-	++	-	0
BL31	R19	+	-	-	-	+	0	0	0	-	+	-	0
KG6	R18	+/-	-	+/-	+	+	0	0	+	-	+	++	0
KG26	R18	+/-	0	+/-	+	+	0	0	+	-	+	++	0
RC4	R18	+/-	-	+/-	++	+	0	0	+	-	+	++	0
RC8	R18	+/-	-	--	+	+	0	0	+	-	+	++	0
RC11	R19	+	-	-	+	+	0	0	--	-	++	-	0
LW14	R18	+/-	0	-	+	+	0	0	--	-	+	-	0
LW23	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
LW27	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
LW29	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW30	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW41	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW49	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0
LW53	R18	+/-	0	+/-	-	+	0	0	--	-	++	-	0
LW54	R18	+/-	-	-	+	+	0	0	--	-	++	-	0
LW81	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW82	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0
LW87	R18	+/-	-	+/-	+	+	0	0	--	-	+	-	0
HM4	R18	+/-	-	-	-	+	0	0	--	-	+	-	0
HM7	R19	+/-	-	-	-	+	0	0	--	-	+	-	0
HM28	R18	+/-	-	+/-	+	+	0	0	--	-	+	-	0
HM29	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
MD2	R18	+	-	+/-	-	+	0	0	-	-	+	-	0
MD5	R18	+/-	-	+/-	-	+	0	0	-	-	+	-	0
MD11	R18	+	0	+/-	-	+	0	0	-	-	+	-	0
MD12	R18	+	-	-	-	0	0	0	-	-	++	-	++
MD13	R18	+	0	-	-	+	0	0	--	-	++	-	0
MD18	R18	+	0	-	-	+	0	0	--	-	+	-	0
MD19	R18	+	0	-	-	+	0	0	--	-	+	-	0
MD20	R18	+	-	-	--	0	0	0	-	-	++	-	0
MD25	R18	+/-	-	-	-	+	0	0	-	-	+	-	0
MD29	R18	+/-	-	+/-	-	+	0	0	-	-	+	-	0
MD29	R19	+/-	-	+/-	-	+	0	0	-	-	++	-	0
MD30	R18	+/-	-	+/-	-	+	0	0	-	-	+	-	0
MD32	R18	+/-	0	-	-	+	0	0	-	-	+	-	0
MD33	R18	+/-	-	+/-	-	+	0	0	-	-	++	-	0
MD34	R18	+	0	+/-	-	+	0	0	-	-	+	-	0
MD39	R18	+/-	-	-	-	+	0	0	-	-	+	-	0
MD40	R18	+/-	0	-	-	+	0	0	-	-	++	-	0
MD56	R18	+	-	--	++	+	0	0	-	-	+	-	0
LW6	R18	+/-	-	-	-	+	0	0	--	-	++	-	+
LW7	R18	+	-	-	-	+	0	0	--	-	+	-	0
LW9	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW24	R19	+/-	0	-	+	+	0	0	--	-	+	-	0
LW38	R18	+/-	-	-	-	+	0	0	--	-	+	-	0
LW42	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
LW48	R18	+/-	-	--	-	+	0	0	--	-	++	-	0
LW74	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW78	R18	+/-	-	-	-	+	0	0	--	-	+	-	0
LW83	R18	+/-	0	+/-	-	+	0	0	-	-	+	-	0
LW84	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW86	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
LW91	R19	+/-	0	+/-	-	+	0	0	--	-	++	-	0
NC5	R19	+	0	+/-	++	+	0	0	-	-	++	-	0
NC13	R18	+	0	-	++	+	0	0	-	-	+	-	0
NC77	R18	+	-	-	++	+	0	0	-	-	+	-	+
NC78	R18	+	-	-	++	+	0	0	--	-	++	-	0
NC80	R18	+	0	-	++	+	0	0	--	-	++	-	0
NC81	R18	+	0	-	++	+	0	0	--	-	+	-	0
NC83	R18	+	0	-	++	+	0	0	-	-	+	-	0
SP2	R18	+/-	0	+/-	++	+	0	0	+	-	++	-	0
SP11	R18	+	-	--	++	+	0	0	--	-	+	-	0
SP11(1)	R19	+	-	-	-	+	0	0	--	-	++	-	0
SP11(2)	R19	+	-	--	-	+	0	0	--	-	++	-	0
SP11(3)	R19	+	0	+/-	-	+	0	0	--	-	++	-	0
SP11(4)	R19	+	0	-	-	+	0	0	--	-	++	-	0
SP12	R18	+	0	-	++	+	0	0	--	-	++	-	0
SP14	R18	+	-	--	++	+	0	0	--	-	+	-	0
SP22	R18	+/-	0	+/-	++	+	0	0	+	-	++	-	0
SP23	R18	+	-	-	++	+	0	0	--	-	0	-	0
SP23	R19	+	-	--	-	+	0	0	--	-	++	-	0
BW1	R19	+	-	-	++	+	0	0	-	-	++	-	+
BL3	R18	+/-	-	--	+	+	0	0	+	-	++	++	0
BL4	R19	+/-	-	--	+	+	0	0	+	-	+	++	0
BL8	R18	+/-	0	+/-	+	+	0	0	+	-	++	-	+
BL18	R18	0	-	-	+	+	0	0	-	-	+	++	0
BL18	R19	0	-	-	+	+	0	0	-	-	0	++	0
BL24	R18	+/-	-	+/-	+	+	0	0	+	-	+	++	0
BL32	R18	+/-	-	-	+	+	0	0	+	-	+	++	+
TK6	R18	0	0	+/-	+	+	0	0	-	-	++	-	0
TK10	R18	+	0	-	-	+	0	0	--	-	+	-	0
TK17	R18	+	-	-	++	+	0	0	-	-	++	-	0
TK18	R18	+	-	--	+	+	0	0	--	-	+	-	++
TK24	R18	+	0	-	-	+	0	0	-	-	++	-	0
TK25	R18	+	0	+/-	-	+	0	0	--	-	+	-	++
TK27	R18	+	0	-	-	+	0	0	-	-	+	-	0
TK29	R19	+	-	-	++	+	0	0	-	-	++	-	0
TK30	R18	+	-	--	++	+	0	0	-	-	0	-	++
TK45	R18	+	-	-	++	+	0	0	--	-	++	-	+
TK46	R18	+	-	--	+	+	0	0	--	-	0	-	0
TK47	R18	+	-	--	--	+	0	0	--	-	+	-	++
TB6	R18	+/-	-	+/-	-	+	0	0	+	-	++	-	0
TB19	R18	+	-	-	--	+	0	0	--	-	++	-	++
TB23	R18	+/-	-	-	-	0	0	0	+	-	+	-	0
TB24	R18	+/-	-	--	++	+	0	0	--	-	+	-	0
MB12	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
MB13	R18	+/-	-	+/-	+	+	0	0	+	++	+	-	0
MB15	R18	+/-	-	+/-	+	+	0	0	+	++	+	-	0
TC7	R18	0	-	+/-	++	+	0	0	+	++	+	-	+
TC19	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC20	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC22	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	+
TC40	R18	+/-	-	+/-	++	+	0	0	+	++	0	-	0
TC45	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC50	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC52	R19	+/-	-	+/-	++	+	0	0	+	++	++	-	0
TC71	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
Site 1	R18	+/-	-	--	+	+	0	0	-	-	+	-	0
Site 2	R18	+/-	0	--	+	+	0	0	-	-	+	-	0
Site 3	R18	+	0	-	+	+	0	0	--	-	+	-	0
Site 4	R18	+/-	0	--	++	+	0	0	0	-	+	++	0
Site 5	R18	+	-	-	-	+	0	0	--	-	+	-	0
Site 6	R18	+/-	-	--	-	+	0	0	+	-	+	++	0
Site 7	R18	+/-	-	+/-	++	+	0	0	-	-	+	-	0
Site 8	R19	+/-	0	+/-	-	+	0	0	+	-	+	-	0
Site 9	R19	+/-	0	--	+	0	0	0	+	++	+	-	0
Site 10	R19	+/-	0	-	-	0	0	0	+	-	+	-	0
Site 11	R19	+/-	-	+/-	+	0	0	0	+	-	++	++	0

N111. The SA findings for all reasonable alternatives were fed back to the Council to inform the selection of options that were to be taken forward, and rejection of options that were not preferred. NuLBC's outline reasons for selection and rejection of growth options is set out in **Appendix D**, and sites in **Appendix I** (see **Volume 3**).

7 The preferred approach

Newcastle-under-Lyme Local Plan policies

- N112. Following consideration of comments received during the two Regulation 18 consultations as well as recommendations set out in the SA reports and other evidence documents, NuLBC has produced the Regulation 19 Publication consultation version of the Local Plan and has revised the Local Plan policies.
- N113. The Local Plan contains the Vision, Strategic Objectives and a total of 55 policies, including strategic and non-strategic policies, and 45 site allocation policies. The 55 strategic/non-strategic policies have been assessed in **Appendix G**, and site policies in **Appendix J**.
- N114. The final local plan policies are listed in **Table N.16**.

Table N.16: Newcastle-under-Lyme Local Plan Policies

Policy Ref.	Policy name	Type of policy
Planning for Sustainable Development		
PSD1	Overall Development Strategy	Strategic
PSD2	Settlement Hierarchy	Strategic
PSD3	Distribution of Development	Strategic
PSD4	Development Boundaries and the Open Countryside	Strategic
PSD5	Green Belt	Strategic
PSD6	Health and Wellbeing	Strategic
PSD7	Design	Strategic
Climate and Renewable Energy		
CRE1	Climate Change	Strategic
CRE2	Renewable energy	Strategic
Housing		
HOU1	Affordable Housing	Strategic
HOU2	Housing Mix and Density	Strategic
HOU3	Housing Standards	Strategic
HOU4	Gypsy, Travellers and Travelling Showpeople	Non-strategic
HOU5	Specialist Needs Housing	Non-strategic
HOU6	Self Build and Custom Dwellings	Non-strategic
HOU7	Houses of Multiple Occupation	Non-strategic
HOU8	Rural and First Homes Exception Sites	Non-strategic
HOU9	Community Led Exception Sites	Non-strategic
HOU10	Extensions, Alterations and Relationships between Dwellings	Non-strategic
HOU11	Backland Development	Non-strategic
Employment		
EMP1	Employment	Strategic
EMP2	Existing Employment Sites	Non-strategic
EMP3	Tourism	Non-strategic
Retail		

Policy Ref.	Policy name	Type of policy
RET1	RET1: Retail	Strategic
RET2	RET2: Shop Fronts, Advertisements, New Signage	Non-strategic
RET3	RET3: Restaurants, Cafes, Pubs and Hot Food Takeaways	Non-strategic
RET4	RET4: Newcastle-under-Lyme Town Centre	Non-strategic
RET5	RET5: Kidsgrove Town Centre	Non-strategic
Infrastructure and Transport		
IN1	IN1: Infrastructure	Strategic
IN2	IN2: Transport and Accessibility	Strategic
IN3	IN3: Access and Parking	Non-strategic
IN4	IN4: Cycleways, Bridleways and Public Rights of Way	Non-strategic
IN5	IN5: Provision of Community Facilities	Non-strategic
IN6	IN6: Telecommunications Development	Non-strategic
IN7	IN7: Utilities	Strategic
Sustainable Environment		
SE1	SE1: Pollution and Air Quality	Strategic
SE2	SE2: Land Contamination	Non-strategic
SE3	SE3: Flood Risk Management	Strategic
SE4	SE4: Sustainable Drainage Systems	Non-strategic
SE5	SE5: Water Resources and Water Quality	Strategic
SE6	SE6: Open Space, Sports and Leisure Provision	Strategic
SE7	SE7: Biodiversity Net Gain	Strategic
SE8	SE8: Biodiversity and Geodiversity	Strategic
SE9	SE9: Historic Environment	Strategic
SE10	SE10: Landscape	Non-strategic
SE11	SE11: Trees, Hedgerows and Woodland	Non-strategic
SE12	SE12: Amenity	Non-strategic
SE13	SE13: Soil and Agricultural Land	Non-strategic
SE14	SE14: Green and Blue Infrastructure	Non-strategic
Rural Matters		
RUR1	Rural Economy	Non-strategic
RUR2	Rural Workers Dwellings	Non-strategic
RUR3	Extensions and Alterations to Buildings Outside of Settlement Boundaries	Non-strategic
RUR4	Replacement Buildings Outside of Settlement Boundaries	Non-strategic
RUR5	Re-use of Rural Buildings for Residential Use	Non-strategic
Site Allocations		
SA1	General Requirements (Site Allocations)	Strategic

N115. The impact matrices for the strategic and non-strategic policy assessments including the Vision and Strategic Objectives are presented in **Table N.17**. These impacts should be read in conjunction with the full assessment narrative presented in **Appendix G**.

Table N.17: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
Vision	+/-	+/-	+	+	+	+	+	++	+	++	+/-	++
Objectives	++	+	+	+	+	+	+	++	++	++	++	++
PSD1	--	-	-	-	+/-	-	+/-	+/-	-	++	+/-	++
PSD2	+	-	-	-	-	-	-	-	+	++	+	++
PSD3	+	-	-	-	-	-	-	-	+	++	+	++
PSD4	0	0	0	+	0	0	0	+	0	+	0	+
PSD5	+/-	+/-	0	-	+/-	+/-	+/-	-	0	+	0	+
PSD6	+	0	0	0	0	0	0	0	++	++	+	0
PSD7	+	+	+	+	+	+	+	++	+	++	+	0
CRE1	++	+	+	++	+	+	+	+	+	+	+	0
CRE2	++	+	0	+	0	0	0	0	0	0	0	0
HOU1	0	0	0	0	0	0	0	+	+	++	0	0
HOU2	0	0	0	0	0	0	0	0	+	++	0	0
HOU3	0	0	0	0	0	0	0	0	+	+	0	0
HOU4	0	-	0	-	0	-	0	0	-	+	+	0
HOU5	0	0	0	0	0	0	0	0	+	+	0	0
HOU6	+	0	0	+	0	0	0	0	0	+	0	0
HOU7	0	0	0	0	0	0	0	0	+	+	+	0
HOU8	0	0	0	+/-	0	0	0	0	+	+	0	+
HOU9	0	0	0	+/-	0	0	0	0	0	+	0	0
HOU10	0	0	0	0	0	0	0	+	0	+	0	0
HOU11	0	0	0	0	0	0	0	+	0	0	0	0
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++
EMP2	0	0	0	+	0	0	0	0	0	0	0	+
EMP3	0	0	0	+	0	0	+	0	0	0	+	+
RET1	0	0	0	0	0	0	0	+	+	+	+	++
RET2	0	0	0	0	0	0	+	+	0	0	0	0
RET3	0	0	0	0	0	0	0	0	+	0	0	0
RET4	+	-	0	+	0	0	-	+	0	+	+	+
RET5	+	+	+	0	+	0	0	+	+	0	++	+
IN1	+	0	+	+	+	+	+	0	+	+	+	0
IN2	+	+	0	0	0	+	0	+	+	+	++	+
IN3	+	+	0	0	0	0	0	0	+	0	+	0
IN4	0	0	0	0	0	0	0	0	+	0	+	0
IN5	0	0	0	+	0	0	0	0	0	+	0	0
IN6	+	+	0	0	0	0	0	0	0	0	0	+
IN7	+	0	+	0	+	+	0	0	+	0	0	0
SE1	+	+	+	0	0	+	0	+	+	+	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE2	0	0	+	+	0	+	0	0	+	0	0	0
SE3	+	0	0	0	++	+	0	0	0	0	0	0
SE4	+	0	+	0	+	+	0	0	0	0	0	0
SE5	0	0	+	0	0	+	0	0	+	0	0	0
SE6	0	0	+	0	0	0	0	+	++	+	0	0
SE7	+	+	++	0	+	0	0	0	+	0	0	0
SE8	+	+	++	+	+	+	0	0	+	0	0	0
SE9	0	0	0	0	0	0	++	+	0	0	0	+
SE10	+	0	+	0	+	+	+	++	+	0	0	0
SE11	+	+	++	+	+	+	0	+	+	0	0	0
SE12	0	0	0	0	0	0	0	+	+	0	0	0
SE13	+	0	0	++	0	0	0	0	0	0	0	+
SE14	+	+	++	+	++	+	0	+	+	0	+	0
RUR1	0	0	0	+	0	0	+	+	+	0	0	++
RUR2	0	0	0	+/-	0	0	+	+	0	+	0	+
RUR3	0	0	0	+/-	0	0	+	+	0	0	0	0
RUR4	0	0	0	+/-	0	0	+	+	0	0	0	0
RUR5	0	0	0	+	0	0	+	+	0	0	0	0
SA1	+	+	++	+	++	++	+	+	+	++	+	0

Site allocations

N116. Following the assessment of reasonable alternatives in the SA, before and after mitigation, and consideration of other evidence-based documents, NuLBC has selected the following development sites for allocation:

- 40 sites for residential use
- Four sites for employment use
- Two sites for Gypsy, Traveller and Travelling Showpeople use; and
- Eight mixed use sites.

N117. Following the information from a further HEDNA Update prepared in April 2024²⁹, there was concern that the standard method figure (6,940 dwellings) will not provide enough homes to align with the latest employment growth forecasts for the Plan period.

N118. A total of 45 site allocation policies were assessed which relate to proposed development sites which were previously assessed as part of the wider reasonable alternative site assessments. The assessment of site policies has drawn on the findings from the post-

²⁹ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/> [Date accessed: 04/07/24]

mitigation evaluation of allocated sites as outlined in **Table N.15** with the full assessments in **Appendix H**. These assessments also take into account the further site-specific information and mitigation proposed through the site policies for the 45 sites which have been selected for allocation.

- N119. The impact matrices for all site policy assessments are presented in **Table N.18** below. More detailed narrative on the site policy assessments can be found in **Appendix J**.

Table N.18: Summary of site policy assessments (extracted from **Appendix J**)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB2	0	-	0	-	0	0	0	-	-	0	0	++
AB12	0	0	0	0	+	0	0	-	-	++	-	0
AB15	+/-	0	0	0	+	0	0	-	-	+	-	0
AB33	0	0	0	0	+	0	0	-	-	+	-	0
BW1	+	-	-	++	+	0	0	-	-	++	-	+
CT1	+	-	0	++	+	0	0	-	-	++	+	0
CH13	+/-	0	0	+	0	0	0	+	0	0	0	0
CH14	0	0	0	+	+	0	0	+	0	+	0	0
CT20	+/-	0	--	++	+	0	0	-	-	0	+	+
KL13	+	-	-	-	+	0	0	-	-	++	0	0
KL15	+	-	0	-	+	0	0	-	-	++	-	++
KG6	+/-	-	+	+	+	0	0	+	-	+	++	0
G&T11	+/-	-	+	+	0	0	0	+	-	+	++	0
KS3	0	0	0	+	+	0	0	+	0	++	0	0
KS11	+/-	0	+	+	+	0	0	+	0	+	0	0
KS17	0	0	0	+	+	0	0	+	0	+	0	0
KS18	+/-	0	+	+	+	0	0	+	0	+	0	0
KS19	+/-	0	+	+	+	0	0	+	-	+	-	0
LW53	+/-	0	0	-	+	0	0	+	-	++	-	0
MD29	+/-	-	0	-	+	0	0	-	-	++	0	0
NC13	+	0	-	++	+	0	0	-	-	+	-	0
SP2	+/-	0	0	++	+	0	0	+	-	++	-	0
SP11 (1, 2, 3, 4)	+	-	0	-	+	0	0	-	0	++	+	0
SP22	+/-	0	0	++	+	0	0	+	0	++	-	0
SP23	+	-	--	-	+	0	0	-	-	++	0	0
G&T8	+/-	-	0	+	0	0	0	+	-	++	++	0
BL8	+/-	0	0	+	+	0	0	+	0	++	0	+
BL18	0	-	0	+	+	0	0	-	-	0	++	0
BL32	+/-	-	-	+	+	0	0	+	-	+	++	+
TK6	0	0	0	+	+	0	0	-	-	++	0	0
TK10	+	0	-	-	+	0	0	-	-	+	0	0
TK17	+	-	-	++	+	0	0	-	-	++	0	0



	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TK27	+	0	-	-	+	0	0	-	-	++	0	0
TB6	+/-	-	+	-	+	0	0	+	0	++	0	0
TB19	+	-	0	--	+	+	0	-	-	++	-	++
TB23	+/-	-	-	-	0	0	0	+	-	+	0	0
TC7	0	-	0	++	+	0	0	+	++	+	0	+
TC19	+/-	-	0	++	+	0	0	+	++	+	0	0
TC20	+/-	-	+	++	+	0	0	+	++	+	0	0
TC22	+/-	-	0	++	+	0	0	+	++	+	0	+
TC40	+/-	-	0	++	+	0	0	+	++	0	0	0
TC45	+/-	-	0	++	+	0	0	+	++	+	0	0
TC50	+/-	-	+	++	+	0	0	+	++	+	-	0
TC52	+/-	-	0	++	+	0	0	+	++	++	0	0
TC71	+/-	-	0	++	+	0	0	+	++	+	0	0




8 Likely significant effects on the environment



Identified impacts

- N120. Proposals in the Local Plan have been assessed for their sustainability impacts, the results of which are presented in the relevant appendices / report chapters as listed above. The assessment of the Plan, including reasonable alternatives, was undertaken using a combination of empirical evidence, and to a lesser extent, professional judgement.
- N121. **Table N.19** provides a summary of the potential negative impacts of the LP relating to each of the sustainability themes (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**). These are the impacts that have been identified prior to the implementation of LP or adopted Local Plan mitigation.

Table N.19: Summary of identified potential impacts of the Newcastle-under-Lyme Local Plan

Sustainability theme	Summary of potential impacts of the Local Plan
 AIR	<ul style="list-style-type: none"> • Reduction in air quality – The construction and operation of different types of development proposed within the Local Plan can lead to adverse effects on air quality. This includes new development which will be likely to increase the volume of traffic and associated emissions within the Plan area. An increase in air pollution from vehicle emissions could potentially have adverse impacts on biodiversity assets through a process known as 'nitrogen deposition' which changes nutrient or toxicity levels. • Increased pollutant emissions - The scale of development proposed in the Local Plan be likely to increase the volume of traffic within the Plan area, and as a result, associated transport-related emissions including NO₂ and PM₁₀ will be released into the atmosphere, with adverse effects on local air quality.
 BIODIVERSITY, FLORA & FAUNA	<ul style="list-style-type: none"> • Threats or pressures to European sites – Newcastle-under-Lyme contains two statutory protected Ramsar sites: Midland Meres and Mosses Phase 1 and 2 at Betley Mere. The HRA Screening identified potential for likely significant effects on European sites arising as a result of the site allocations, due to effects on air quality, water quality and quantity and recreational pressures. • Threats or pressures to nationally designated biodiversity sites – There are five SSSIs in Newcastle-under-Lyme. Potential impacts on SSSIs include increased recreational disturbance caused by residents visiting the designated sites (including direct effects such as trampling and indirect effects of disturbance to ground nesting birds from dog walking), and deterioration of local air quality due to increased traffic levels. • Threats or pressures to locally designated biodiversity sites – Newcastle-under-Lyme contains four LNRs and a number of locally designated sites. Adverse impacts could potentially include direct impacts on habitats and / or indirect impacts such as increased recreational disturbance caused by local residents visiting these sites. • Loss or degradation of habitats and species of principal importance, priority habitats and ancient woodland – A total of 3.43% of the total site allocations by area coincide with priority habitats, including Site BL18 which coincides with lowland fens which is a very high distinctiveness habitat.

Sustainability theme	Summary of potential impacts of the Local Plan
	<ul style="list-style-type: none"> • Fragmentation of the ecological networks and loss of distinctive habitats - The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur.
 CLIMATIC FACTORS	<ul style="list-style-type: none"> • Increased carbon emissions – The proposed development of 8,000 dwellings and 63ha of employment floorspace within the Local Plan will be likely to increase to some extent local carbon emissions through energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. This impact will be expected to contribute towards the causes of climate change and secondary effects like sea level rise and extreme weather events. • Loss of multi-functional green infrastructure – When considered as a whole (i.e. cumulatively), the proposed development within the Local Plan will result in the loss of a significant area of previously undeveloped land. This may also result in the loss of trees, hedgerows and other vegetation currently on site in some places. Multi-functional green infrastructure is vital in helping to reduce the adverse impacts of climate change.
 CULTURAL HERITAGE	<ul style="list-style-type: none"> • Alter character and/or setting of designated heritage assets – Development which coincides with or is located in close proximity to a heritage asset has the potential to affect both the asset itself and its setting, depending on the nature and location of development and factors that contribute to the significance of heritage assets. • Alter the character and/or setting of Conservation Areas - Conservation Areas (CAs) are identified as areas of architectural or historic interest and designated at a local level. Development within or in proximity to a CA has the potential to adversely impact the character or setting of the CA.
 HUMAN HEALTH	<ul style="list-style-type: none"> • Sustainable access to healthcare / leisure facilities – Newcastle-under-Lyme is a largely rural borough. There are no NHS hospitals providing an A&E service within the borough, and healthcare and leisure facilities are generally restricted to the larger settlement centres meaning that a large proportion of the proposed growth will be located outside of the identified sustainable target distances to these facilities. Where there is more limited access to these facilities, residents may be discouraged from living active and healthy lifestyles, which could potentially have adverse impacts on mental wellbeing as well as physical health. • Exposure to air / noise pollution (from AQMAs / main roads) - The long-term health of residents, in particular vulnerable groups including children and the elderly can be affected by local reductions in air quality. Development within 200m of an AQMA or main road may expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health. • Limited access to public greenspace - Good access to public green or open spaces, a diverse range of natural habitats and travelling via walking and cycling are known to have physical and mental health benefits. Whilst there is generally good access to open space across Newcastle-under-Lyme as a whole, there are some areas with more limited access to different types and sizes of open space. • Limited access to PRoW or cycle network - The majority of allocated sites are located in areas with good coverage by the PRoW, pedestrian and/or cycle networks, providing many site end users with opportunities for active travel and recreation in the countryside. However, a small number of allocated sites do not currently have safe pedestrian or cycle access adjacent



Sustainability theme	Summary of potential impacts of the Local Plan
	to the site, where site end users may be reliant on less sustainable modes of transport including private car use.
 LANDSCAPE	<ul style="list-style-type: none"> • Alteration of landscape character – The introduction of new built form can conflict with distinctive local character of existing landscapes and townscapes. The majority of sites are located within 'Ancient Redland Farmlands', 'Ancient Clay Farmlands', 'Coalfield Farmlands' and 'Sandstone Hills and Farmlands' Landscape Character Types (LCTs), where arable pastureland and undulating rolling hills are often key characteristics. Some of the allocated sites located in these areas could lead to losses of these features or change the character. • Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt – The potential for adverse effects of development proposals on landscape sensitivity and the Green Belt have been identified with reference to the Landscape and Settlement Character Assessment (LSCA) Study³⁰ and the Green Belt Study³¹, where some allocations lie in areas of 'medium' or 'high' sensitivity to development, or areas which make a 'moderate' or 'strong' overall contribution to the purposes of the Green Belt³². • Change in views from public rights of way - The development proposed in the Plan has the potential to adversely impact on informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations. • Increased risk of urbanization and the countryside and coalescence - The risk of urban sprawl and coalescence between settlements could potentially have adverse impacts on the landscape character, where new development is situated outside of existing settlements or has potential to merge settlements together, leading to urbanisation of the countryside. • Loss of tranquillity - Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. The introduction of both noise and night-time lighting through new development is likely to reduce tranquillity in some locations. • Threats to important trees - Tree Preservation Orders (TPOs) are assigned to specific trees or groups of trees of which their retention is expedient in the interests of amenity of the local area. A TPO prohibits the damage or destruction of trees without the written consent of the Council. A total of 12 sites coincide or lie adjacent to trees under TPOs which have potential for adverse effects on these trees and their protected status, with further implications for the appearance and character of the local landscape.
	<ul style="list-style-type: none"> • Provision of housing and employment land to meet the local need – The Local Plan proposes the development of 8,000 dwellings across the Plan period to 2040 and the development of 63ha of employment floorspace. This is expected to meet the identified housing and economic need as set out in the latest Housing and Economic Needs Assessment (HEDNA)³³. The

³⁰ Chris Blandford Associates (2023). Landscape character study (part 3). Newcastle-under-Lyme Landscape and Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/629/landscape-character-study-part-3> [Date accessed: 24/01/24]

³¹ Arup (2024) Newcastle-under-Lyme Council Green Belt Site Review: Consolidated Report. Draft, 13 May 2024.

³² DLUHC (2023) NPPF – Paragraph 143. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date accessed: 05/07/24]

³³ Turley (2024) Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update, April 2024

Sustainability theme	Summary of potential impacts of the Local Plan
POPULATION & MATERIAL ASSETS	<p>Plan will be likely to have a positive impact on the local economy, as well as the wellbeing of residents.</p> <ul style="list-style-type: none"> • Sustainable access to services and facilities - Some site allocations will be situated outside of the sustainable distance to essential services, such as schools and local convenience stores. Good access to these services is essential to reduce reliance on private car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion. • Increased pressure on local services and facilities - The proposed development within the Local Plan is expected to increase population density across Newcastle-under-Lyme. This will be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces. • Effects on community cohesion - The Local Plan will be likely to have a positive effect with regard to establishing and maintaining cohesive communities, through seeking to provide a range of housing, employment opportunities and supporting infrastructure to meet the varied needs of the local population. • Increased household waste generation - The proposed development of 8,000 new dwellings within the Local Plan is expected to increase household waste generation, and have a potential adverse effect on the capacity of waste management facilities within the Plan area. • Impacts on mineral resources - Where a development proposal coincides with an identified MSA, as set out in the Minerals Local Plan³⁴, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals will be inaccessible for potential extraction in the future.
 SOIL	<ul style="list-style-type: none"> • Direct loss of soil resources and BMV land – The development of new buildings on previously undeveloped land will be expected to result in a direct loss of soil resource. BMV land is defined through the Agricultural Land Classification (ALC) system as Grades 1, 2 and 3a (soil which is most flexible, productive and efficient in response to inputs, and which can best deliver food and non-food crops for future generations). A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan. • Impact on ecosystem services - Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, carbon storage and providing the basis for vegetation to flourish. In order for soil to continue providing each service, careful consideration should be given to its structure and stability. Where construction occurs, soil could potentially be compacted by heavy vehicles on-site. During the occupation or operation phase of development, soil, in some circumstances, could potentially be paved over, become subject to increased footfall or be subject to increased volumes of fertilisers and other chemicals.
 WATER	<ul style="list-style-type: none"> • Fluvial flood risk– Development within Flood Zones 2 or 3 has the potential to locate site end users at risk of fluvial flooding, may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to increased flood risk downstream. The majority of allocated sites are located in Flood Zone 1; however, five of the allocated sites coincide with some areas of Flood Zones 2 and 3.


³⁴ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/mineralsLocalPlan.aspx> [Date accessed: 07/06/24]



Sustainability theme	Summary of potential impacts of the Local Plan
	<ul style="list-style-type: none"> • Surface water flood risk - Development in areas of surface water flood risk may locate site end users in areas at risk of flooding, with safety implications, and further exacerbate flood risk in the surrounding area. The majority of the allocated sites coincide with varying extents of surface water flood risk. • Reduction in water quality and ecosystem services - Water provides a range of essential ecosystem services, including providing the basis for vegetation to flourish and supporting biodiversity. Development and urbanisation can be associated with adverse impacts on water quality, including risks of water pollution associated with runoff from roads, and from water outflows during storm conditions. The majority of the allocated sites are located either wholly or partially on previously undeveloped land. Additionally, Site TC40 is located within 10m of the Lyme Brook watercourse. The construction and occupation of these developments has the potential to increase the risk of contamination and pollution of waterways. • Increase in water demand – The likely population growth as a result of the proposed development of 8,000 dwellings over the Plan period will increase the local population, which will be likely to increase water demand. • Increased pressure on wastewater treatment - The proposed development of 8,000 new dwellings within Newcastle-under-Lyme is expected to increase the local population, and subsequently, increase pressure on wastewater treatment networks across the Plan area.



Mitigation



N122. **Table N.20** summarises these mitigating effects of the 55 Local Plan strategic and non-strategic policies and the 45 site allocation policies (as set out in full within **Chapters 7 – 15** of the Main SA Report, **Volume 2**).


Table N.20: Summary of policy mitigation


Sustainability theme	Summary of mitigating effects of the Local Plan policies
 AIR	<ul style="list-style-type: none"> • Policy SE1: 'Pollution and Air Quality' ensures that development will not worsen air quality within AQMAs and will consider the cumulative effects of emissions from proposed development. The policy will refuse development likely to result in detrimental impacts on air quality, unless mitigation measures effectively address the impacts. • Policy CRE1: 'Climate Change' will encourage new developments to incorporate measures to improve energy efficiency and is likely to help reduce the demand for energy, potentially leading to lower emissions of air pollutants during construction and occupation of development. • Policy CRE2: 'Renewable Energy' promotes alternate renewable and low carbon technologies that can contribute towards improved air quality by reducing pollutants. • Policy IN2: 'Transport and accessibility' will encourage the uptake of sustainable transport options, which will be likely to improve air quality in Newcastle-under-Lyme. • Policy PSD7: 'Design', Policy SE14: 'Green and Blue Infrastructure' and Policy SE8: 'Biodiversity and Geodiversity' include measures to enhance the provision and connectivity of green and blue infrastructure, which will help to support ecosystem service functions such as filtration of air pollutants and could potentially result in improvements to air quality. • Policy IN3: 'Access and Parking' supports the provision of electric vehicle infrastructure such as charging points, and secure bicycle storage, facilitating

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<p>the uptake of low or zero emission vehicles and active travel, which will expect to reduce transport related emissions in Newcastle-under-Lyme.</p> <ul style="list-style-type: none"> Various site policies set out requirements for an air quality assessment and mitigation strategy to be conducted at multiple sites in proximity to AQMAs or main roads, which is likely to help ensure the construction and occupation of new development avoids residents being exposed to a decline in air quality.
 <p>BIODIVERSITY, FLORA & FAUNA</p>	<ul style="list-style-type: none"> Policy SE8: 'Biodiversity and Geodiversity' sets out the Council's strategy for conservation and enhancement of biodiversity, geodiversity and ecological networks in the borough. The policy sets out the requirement to follow the mitigation hierarchy which will protect European sites, nationally designated sites and locally designated sites from adverse effects. Policy SE7: 'Biodiversity Net Gain', supported through financial contributions by Policy IN1: 'infrastructure' requires development to deliver mandatory Biodiversity Net Gain (BNG) in line with national standards. The policy also encourages BNG to link with the emerging Nature Recovery Network and Local Nature Recovery Strategy, helping to conserve and enhance biodiversity within the borough. Policy SE11: 'Trees, Hedgerows and Woodland' aims to create, retain and protect trees, hedgerows and woodlands, including ancient woodland and veteran trees across the Plan area. Policy SE14: 'Green and Blue Infrastructure', Policy PSD7: 'Design,' Policy SE6: 'Open Space, Sports and Leisure Provision', Policy CRE1: 'Climate Change' and Policy SA1: 'General Requirements' seek improved provision and connectivity of green/blue infrastructure, to retain and improve habitat connectivity and ecological corridors amongst built development. Policy RET5: 'Kingsgrove Town Centre' supports the provision of green routes and pocket parks within the town, complementing the GI provisions in the other policies.
 <p>CLIMATIC FACTORS</p>	<ul style="list-style-type: none"> Policy SE1: 'Pollution and Air Quality' will ensure that the cumulative effects of emissions from proposed developments are considered, which could help to reduce air pollutants including GHGs. Policy Policy CRE1: 'Climate Change', supported by Policy SA1: 'General Requirements', will ensure that development contributes towards the mitigation of, and adaptation to climate change, ensuring net zero national targets are met. The policy will ensure development proposals are of sustainable design by improving energy efficiency and utilising low carbon or renewable energy sources. Policy CRE2: 'Renewable Energy' promotes climate change resilience, encouraging the use of low-carbon and renewable energy sources, reducing the reliance on energy produced from fossil fuels. An energy statement will be required for major development proposals, ensuring 10% of energy is from renewables. Policy IN1: 'Infrastructure', Policy IN2: 'Transport and Accessibility' and Policy IN4: 'Cycleways, Bridleways and Public Rights of Way' promote measures to reduce the need to travel and encourage the uptake of sustainable transport options, as well as the development of walkable neighbourhoods, which are likely to contribute to climate change mitigation through reduced transport-associated GHG emissions. Various Local Plan policies, including Policy PSD7: 'Design', Policy SE14: 'Green and Blue Infrastructure' and Policy SE8: 'Biodiversity and Geodiversity' include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as filtration of air pollutants including GHGs.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
 <p>CULTURAL HERITAGE</p>	<ul style="list-style-type: none"> • Policy PSD7: 'Design' guides the design of new developments, ensuring that schemes are in accordance with the National Design Code as well as any local design codes or guidance. Effective design codes can help to ensure new developments are integrated into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. • Policy SE9: 'Historic Environment' sets out the requirement for development proposals to avoid harm to designated and non-designated assets, seeking to "<i>conserve and, where possible, enhance the significance of all heritage assets and their settings</i>". The policy will ensure Heritage Assessments are carried out where there is potential for adverse effects to occur, and encourages opportunities to better reveal the significance of heritage assets, and respect and enhance significant views. • Policy SE10: 'Landscape' will be likely to conserve and enhance local landscape features, including elements of the historic environment through ensuring development is guided by the Landscape and Settlement Character Assessment (LSCA) and Landscape Strategy. • Policy CRE1: 'Climate Change' encourages retrofitting historic buildings with measures to mitigate and adapt to climate change, where appropriate, which could help to improve the energy efficiency of historic buildings and encourage the conservation and renewal of cultural heritage assets.
 <p>HUMAN HEALTH</p>	<ul style="list-style-type: none"> • Policy PSD6: 'Health and Wellbeing' sets out the Council's intention to support healthy and active lifestyles, supporting the aims of the Staffordshire Joint Wellbeing Strategy, addressing health inequalities and providing access to leisure and healthcare services. The policy will ensure no unnecessary loss of open space or GI/BI resources as identified in the Open Space and Green Infrastructure Strategy. • Policy SE6: 'Open Space, Sports and Leisure Provision' and various site policies will help to ensure that local residents have access to open spaces, sports and leisure facilities and that the provision, enhancement and maintenance of such services is catered for to meet the local demand. Loss of green/open spaces will only be permitted where it is demonstrated that these are surplus to requirements or will be replaced by equal or enhanced provisions. • Policy IN1: 'Infrastructure' will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, which includes healthcare facilities. This is supported by a large number of site policies, which require to developers to make financial contributions to the capacity of local health facilities. • Policy IN2: 'Transport and Accessibility' and numerous site policies seek to promote sustainable transport and promote improved connectivity to local services (including healthcare facilities) through a range of criteria for new development proposals. • Policy PSD7 'Design', Policy SE14 'Green and Blue Infrastructure' and Policy SE8 'Biodiversity and Geodiversity' include provisions to enhance the provision and connectivity of GI/BI, and provide more opportunities for local residents to access greenspace and nature provision. • Policy IN4: 'Cycleways, Bridleways and Public Rights of Way' aim to ensure that development proposals provide good access, including via active travel, which may help to encourage active lifestyles and increase the uptake of cycling and walking, through the provision of safe and accessible routes. • Local Plan policies which will improve the air quality of the plan area and reduce emissions have been discussed in the sustainability theme 'Air' above.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
 <p>LANDSCAPE</p>	<ul style="list-style-type: none"> • Policy SE10: 'Landscape' will ensure that development proposals are guided by the findings of the LCSA, and include measures to conserve and enhance the local landscape character and distinctiveness, and ensuring developments identify and protect key views to landmark features. Major developments will need to be accompanied by a Landscape and Visual Impact Assessment (LVIA). • Policy SE9: 'Historic Environment' will ensure development is informed by the Staffordshire Historic Landscape Characterisation and encourages opportunities for development proposals to enhance significant views. • Policy PSD7: 'Design' will guide the design of developments and ensure that schemes are in accordance with both the National Design Code as well as integrating local design codes, thereby protecting local landscape features and local identity. • Policy RET1: 'Retail', RET4: 'Newcastle-under-Lyme' Town Centre' and Policy RET5: 'Kidsgrove Town Centre' include measures to ensure development aligns with surrounding landscape features and townscape character. • Policy SA1: 'General Requirements' sets out a range of compensatory improvements to the landscape, environmental quality and accessibility of the remaining Green Belt where sites are proposed to be released from the Green Belt; this includes new and enhanced GI, biodiversity improvements, landscape and visual enhancements, new walking routes and recreational provisions. • Policy PSD5: 'Green Belt' and various site policies will protect the retained Green Belt and its functions, including in preventing urban sprawl, which in turn can help to protect landscape character. The policy will ensure that development proposals for sites removed from the Green Belt deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt to offset adverse effects. • Policy SE14: 'Green and Blue Infrastructure' include provisions to enhance the provision and connectivity of GI/BI, which will be likely to improve the appearance and character of the local landscape. • Policy PSD4: 'Development Boundaries and the Open Countryside' ensures development proposals will be supported where they are in keeping with the surrounding landscapes. • Policy SE12: 'Amenity' will ensure that noise and light pollution and environmental disturbances are considered within new developments, thereby helping to protect tranquillity. • Policy SE11: 'Trees, Hedgerows and Woodland' and various site policies will ensure that trees are protected (or replaced where loss is unavoidable), and new trees planted, leading to an increase in overall canopy cover.
 <p>POPULATION & MATERIAL ASSETS</p>	<ul style="list-style-type: none"> • Policy PSD1: 'Overall Development Strategy' sets out the Council's overall approach to the development strategy for the Plan period to 2040 including the delivery of a minimum of 63ha of new employment land and 8,000 dwellings to meet the identified housing and employment needs. • Policy HOU1: 'Affordable Housing' will help to ensure that the Local Plan delivers an appropriate distribution of affordable housing that meets the varied needs of current and future residents of the borough. • Policy HOU2: 'Housing Mix and Density' aims to ensure that the Local Plan delivers an appropriate density and mix of housing to meet the varied needs of current and future residents, whilst responding to the local characteristics and sensitivities. • Various Local Plan policies, including Policy HOU3 'Housing Standards', Policy HOU4 'Gypsy, Travellers and Travelling Showpeople', Policy HOU5 'Specialist Needs Housing', Policy HOU6 'Self Build and Custom Dwellings', Policy HOU7 'Homes in Multiple Occupation' and Policy SA1 'General

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<p>Requirements' will ensure that the varied needs of Newcastle-under-Lyme's different communities are met in a sustainable manner.</p> <ul style="list-style-type: none"> • Suitable provision for bin storage, recycling and waste collection at development sites is included within Policy HOU11: 'Tandem or Backland development', Policy HOU10: 'Extensions, Alterations and Relationships between Dwellings', Policy HOU7 and Policy HOU4. • Policy EMP1: 'Employment' seeks to meet the identified employment land needs within Newcastle-under-Lyme over the Local Plan period, through supporting proposals for the expansion, intensification or redevelopment of employment sites where this would not compromise other objectives of the Local Plan. • Policy EMP2: 'Existing Employment Sites' will ensure that any proposals for alternative uses on existing employment land are only supported where the land is no longer suitable or required for employment uses, and the alternative use is appropriate for its surroundings. • Policy PSD2 'Settlement Hierarchy' and Policy PSD3 'Distribution of Development' set out the hierarchy of settlements within the borough and direct development in accordance with infrastructure service provision, namely by prioritising development in and around the town centres where sustainable transport and active travel options are most prevalent. • Policy IN5: 'Provision of Community Facilities' will help to safeguard and improve services for use by local communities, in line with evidenced needs. • Policy PSD7 'Design', development is guided to improve accessibility and connectivity to align with the Building for a Healthy Life (BHL) design toolkit, that includes provision of high-quality neighbourhoods which are well connected via active travel routes, with integrated open spaces and green/blue infrastructure in order to benefit quality of life for residents. • Policy RE1: 'Retail' will ensure that development proposals for retail and leisure be promoted in appropriate areas, within the defined centres, co-locating facilities and creating a sense of community within local centres. • Policy IN1: 'Infrastructure' supports improvements to household waste recycling services, such as the recycling centre at Leycett Lane. • Policy SA1: 'General Requirements' and various site policies will ensure that where proposed development sites are located within an MSA, a minerals resource assessment is carried out. This will be likely to ensure the conservation of mineral resources and ensure minerals are extracted prior to development, where viable and practicable, in accordance with the adopted Minerals Local Plan for Staffordshire. • Local Plan policies which will ensure sustainable access to services and facilities have been discussed within the sustainability theme 'Human Health' above.
 <p>SOIL</p>	<ul style="list-style-type: none"> • Policy SE13: 'Soil and Agricultural Land' sets out protection for BMV land, requiring new development affecting land of ALC Grades 1, 2 and 3a to provide evidence that no suitable alternative sites on land of lower agricultural quality are available. • Policy PSD4: 'Development Boundaries and the Open Countryside' encourages the redevelopment and re-use of previously developed land and will only permit new development within the open countryside in specific circumstances. This will help to protect soil resources within these areas and promote an efficient use of land, minimising the loss of undeveloped land for new built development. • Policy SE2: 'Land Contamination' aims to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This policy could help to reduce the amount of development on previously undeveloped land, and therefore, reduce the loss of ecologically or agriculturally valuable soil resources.

Sustainability theme	Summary of mitigating effects of the Local Plan policies
	<ul style="list-style-type: none"> • Policy PSD7: 'Design', Policy SE14: 'Green and Blue Infrastructure' and Policy SE8: 'Biodiversity and Geodiversity' (supported by SA1: General Requirements), and Policy SE6: 'Open Space, Sports and Leisure Provision' seek to enhance the provision and connectivity of GI/BI, which will help to protect underlying soil resources from erosion. • Policy SE11: 'Trees, Hedgerows and Woodland' includes the restoration and enhancement of trees, hedgerows and woodland which help to protect the stability and connectivity of underlying soil resources.
 WATER	<ul style="list-style-type: none"> • Policy SE3: 'Flood Risk Management' sets out the Council's approach to managing the risk of flooding and water resources within the borough, including groundwater. The policy, alongside Policy SA1: General Requirements, will ensure that development proposals are informed by flood risk assessments, where appropriate, and sets out criteria that must be adhered to for different development scenarios in accordance with the Strategic Flood Risk Assessment (SFRA). • Policy SE4: 'Sustainable Drainage Systems' promotes the use of SuDS to manage surface water run-off and reduce the risk of surface water flooding, as well as encouraging opportunities to be sought for integrating multi-functionality. • Several Local Plan policies, including Policy PSD7: 'Design', Policy CRE1: 'Climate Change', Policy SE8: 'Biodiversity and Geodiversity', Policy SE11: 'Trees, Hedgerows and Woodland' and Policy SE14: 'Green and Blue Infrastructure' will contribute towards improved provision and connectivity of green/blue infrastructure, which could help deliver benefits to fluvial and surface water flood risk through providing natural flood storage and drainage and reducing water runoff rates. These policies will also help to support ecosystem service functions such as natural filtration of water to improve water quality. • Policy IN1: 'Infrastructure' and Policy IN7: 'Utilities', supported by SA1: 'General Requirements', seek to ensure that the Local Plan provides appropriate and proportionate infrastructure to deliver the proposed development including environmental infrastructure, along with other infrastructural provisions and utilities including surface water disposal, water supply and wastewater treatment. This will contribute towards flood management and help to conserve water resources and protect water quality in the borough. • Policy SE5: 'Water Resources and Water Quality' seeks to conserve, and where possible enhance, the quality of watercourses, aquatic habitats and groundwater, ensuring development takes into account the objectives of the Water Framework Directive and considers capacity limitations that are outlined within the Water Cycle Study. • Various site policies aim to locate development away from areas of high fluvial or surface water flood risk, through taking a sequential approach to development which prioritises areas of low flood risk.

Residual effects

- N123. The Local Plan provides a range of policies which will likely help mitigate some of the adverse impacts of the proposed development, as outlined in **Table N.20** above. However, where these policies will be unlikely to fully mitigate the identified effects, the following residual effects are identified and drawn to the attention of the plan makers.
- N124. The overall residual positive effects of the Plan are set out in **Table N.21**, and the residual adverse effects in **Table N.22**.

Table N.21: *Likely residual positive sustainability effects of the Local Plan*

Summary of residual positive effects	
1	<p>Multi-functional green infrastructure network</p> <p>The Local Plan promotes the conservation and enhancement of multi-functional GI across the borough, through encouraging development proposals to increase connectivity of the wider green and blue infrastructure network.</p> <p>Although the proposed development within the Local Plan will result in the loss of greenfield land and associated GI to some extent, the Local Plan policies are expected to mitigate and re-compensate this loss of GI, resulting in a positive effect on GI provision in the longer term.</p>
	<p>Access to public greenspace</p> <p>Various Local Plan policies aim to provide a range of open spaces, sport facilities and recreational spaces for site end users, and compensate for any facilities lost to development. This is expected to help facilitate healthy and active lifestyles and supplement the borough's existing recreational resource.</p>
3	<p>Access to PRow and cycle networks</p> <p>A large number of site allocations are expected to link to existing PRow routes which have good coverage across the borough, and some allocations are located in proximity to cycle paths. Various Local Plan policies seek to create permeable neighbourhoods which promote cycling and walking, which is likely to improve the coverage of, and accessibility to the pedestrian and cycle networks across the borough. This would be expected to encourage residents to participate in physical exercise and active travel, with benefits to health and wellbeing.</p>
4	<p>Provision of housing to meet local need</p> <p>In order to meet the identified housing need, the Local Plan proposes to deliver 8,000 new dwellings within the Plan period. Policies set out in the Plan include various requirements to ensure the provision of an appropriate mix of housing types and tenures that will address the needs of different groups including those with specialist needs, first time home buyers, and the Gypsy and Traveller community.</p>
5	<p>Provision of employment opportunities</p> <p>The Plan seeks to deliver 63ha of employment land, exceeding the need identified in the latest HEDNA. Various Local Plan policies are also expected to improve access to employment opportunities, such as through improving sustainable transport options, and by locating employment-lead development in areas with good accessibility to the road and transport networks.</p>
6	<p>Community cohesion</p> <p>The Local Plan policies demonstrate NuLBC's commitment to enhancing community cohesion. These address various needs such meeting accommodation requirements, and safeguarding community services and facilities. The policies also encourage the careful design to co-locate new development with community facilities and open spaces in order to deliver a high-quality public realm.</p>
7	<p>Mineral resources</p> <p>Although the majority of development sites coincide with MSAs, Policy SA1 and the Staffordshire Minerals Local Plan³⁵ seek to prevent the unnecessary sterilisation of mineral resources from non-minerals development. This is expected to conserve mineral resources by ensuring that any potential impact on safeguarded minerals is avoided or minimised.</p>

³⁵ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Documents/The-Minerals-Local-Plan-for-Staffordshire-2015-2030.PDF> [Date accessed: 26/06/24]

Table N.22: *Likely residual adverse sustainability effects of the Local Plan*

Summary of residual adverse effects	
1	<p>Reduction in air quality and increased pollutant emissions</p> <p>Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality.</p> <p>The policies would be expected to prevent unacceptable impacts on human health associated with air pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality as a whole.</p> <p>Over time, this adverse impact is likely to be reduced should there be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars, alongside other advances in technology.</p>
	<p>Fragmentation of the ecological network</p> <p>The Local Plan is expected to result in the loss of a significant amount of previously undeveloped land, including soil resources, habitats and ecological links between biodiversity assets.</p> <p>Fragmentation of the ecological network is likely to be a long-term significant adverse effect. Should biodiversity net gain and landscape-scale ecological enhancements be effectively implemented, there is potential for this effect to be temporary and beneficial in the long-term.</p>
3	<p>Increased greenhouse gas emissions</p> <p>Local Plan policies aim to increase uptake of sustainable transport and active travel, as well as utilising building design and construction methods to minimise the increase in greenhouse gas emissions related to development. However, the Plan is not expected to fully mitigate these impacts, particularly those related to the occupation of development.</p> <p>An increase in carbon emissions in Newcastle-under-Lyme is likely to be a long-term and permanent significant effect. However, over time, there is potential for technological advances and alternative solution to reduce this impact to some extent.</p>
	<p>Limited access to healthcare/leisure facilities and services</p> <p>A notable proportion of site allocations are located outside of the 5km sustainable target distance to an NHS hospital or over 800m from a GP surgery. Local Plan policies such as PSD6 and IN1, are likely to prevent the loss of existing healthcare facilities and improve access to facilities for some residents. However, the policies would not be expected to fully mitigate the restricted access to healthcare services for sites in more rural settlements in Newcastle-under-Lyme.</p>
5	<p>Alteration of landscape character</p> <p>Various Local Plan policies seek to ensure that development proposals maintain and improve the borough's intrinsic rural character and distinctiveness and have regard to the findings of the published LCSA. However, due to the scale of development proposed with a large proportion in previously undeveloped locations surrounding rural settlements, the development set out in the Local Plan could have the potential to alter Newcastle-under-Lyme's distinctive rural character to some extent.</p>
	<p>Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt</p> <p>Local Plan policies seek to ensure that Green Belt land will only be released for development when necessary and justified, whilst having regard to the findings of the LCSA. However, it is unlikely that these impacts could be fully mitigated particularly for allocated sites in areas identified as being of a 'high' or 'medium' sensitivity, or sites allocated in areas with a 'moderate' or 'strong' overall contribution to the purposes of the Green Belt. Within these areas, the landscape is unlikely to be able to accommodate new development without significant change.</p>

Summary of residual adverse effects	
7	<p>Alteration of views</p> <p>Whilst the Local Plan policies provide some protection of visual amenity and views, it is likely a minor residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of the sites proposed in the Local Plan.</p>
8	<p>Increased risk of urbanisation of the countryside and coalescence</p> <p>The identified need to provide housing and employment in the Plan has led to the proposed allocation of development on previously undeveloped greenfield sites at a number of locations within the Newcastle-under-Lyme. Various policies in the Local Plan seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts, and a residual adverse effect is anticipated. This includes potential for reduced separation between some settlements.</p>
9	<p>Loss of tranquility</p> <p>The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquility of the rural landscape as a consequence of increases in noise and light pollution.</p>
10	<p>Increased household waste generation</p> <p>It is difficult for the Local Plan to specifically reduce waste generation within the Plan area. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 8,000 new households is expected to increase waste production to some extent which will impact the capacity of waste management facilities.</p>
11	<p>Loss of soil resources, BMV land and ecosystem services</p> <p>The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.</p>
12	<p>Increased demand for water and wastewater management</p> <p>The increased population within the Plan area would be expected to increase demand on water infrastructure. Although the WCS indicated that Seven Trent Water does not expect water supply infrastructure to be a constraint to development, there is potential for a residual adverse effect in regard to wastewater infrastructure when planned growth is considered in-combination with an increase in sewage production and potential for storm overflow events. It is likely that further monitoring and investment to wastewater infrastructure will be required to accommodate development.</p>

Cumulative effects

- N125. The cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the Local Plan and assessed alongside known existing underlying trends and other PPPs.
- N126. Cumulative effects are different from effects that occur alone. Alone, the Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.
- N127. Cumulative effects of the Newcastle-under-Lyme Local Plan are discussed in **Table N.23**.

Table N.23: Cumulative effects assessment of the Local Plan

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
Air	<ul style="list-style-type: none"> Reduction in air quality Increased pollutant emissions 	<p>Nationally, measures to improve air quality are in place and continue to be prioritised by the UK government, which includes proposals to ban sales of petrol and diesel cars by 2035.</p> <p>Local and national policy promotes the improvement of public transport, pedestrian and cycle networks which would be likely to help reduce reliance on private car use. Despite this, it is likely that many residents within Newcastle-under-Lyme, particularly in the more rural settlements, will rely on cars for travel, to some extent.</p> <p>The Staffordshire Local Transport Plan will continue to encourage and facilitate sustainable modes of travel and manage and maintain local roads and footways. Air quality in the borough is improving, with the Council proposing to revoke one of the four AQMAs, AQMA 'No.4 Little Madeley', that has been compliant with air quality objectives for the previous five years.</p> <p>The introduction of 8,000 dwellings and 63ha of employment floorspace under the Local Plan is likely to increase energy demands, congestion and traffic flows with population growth, increasing pollutant emissions, with implications for air quality, residents and biodiversity particularly within proximity to main roads.</p> <p>Overall, the Plan will likely result in a long-term but potentially temporary significant cumulative adverse effect on air quality, which could result in secondary effects such as for the health of residents.</p>
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Threats or pressures to European sites Threats or pressures to nationally designated biodiversity sites Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites Loss or degradation of habitats of principal importance and ancient woodland Impacts on the ecological network 	<p>Newcastle-under-Lyme supports a range of nationally and locally designated biodiversity sites, including nationally designated SSSIs and locally designated LNRs and sites of biological importance, in addition to a range of priority habitats including ancient woodland.</p> <p>Biodiversity assets including European, national and local designations will continue to benefit from the objectives and measures set out in the Local Plan policies and the Staffordshire Biodiversity Action Plan including species action plans and habitat action plans to restore, protect, and enhance important features.</p> <p>Although the Plan aims to maintain and enhance biodiversity sites and includes various green infrastructure provisions, alongside mandatory 10% biodiversity net gain (BNG), there is potential for the proposed development to adversely affect some biodiversity, flora and fauna features when considered together at a landscape scale. Site-based approaches to nature conservation can fail to identify strategic landscape ecological considerations. The background trends indicate an overall picture of habitat losses and reduction in species diversity in the UK.</p>

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
		Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network.
Climatic factors	<ul style="list-style-type: none"> Increased greenhouse gas (GHG) emissions Loss of multi-functional green infrastructure (GI) 	<p>The Local Plan sets out a range of policies which focus on topics such as sustainable design, low carbon or renewable energy sources, sustainable transport and enhancements to the GI network.</p> <p>Despite these policies, it is likely there will be a cumulative increase in GHG emissions during occupation of new development including those associated with increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. Overall, the Local Plan could potentially result in a cumulative adverse effect on climate change which may lead to secondary effects such as flood risk, particularly along Lyme Brook, threats to the health and safety of residents and possibly the supply of water across the Plan area. This issue requires careful monitoring, and the findings and recommendations of the Staffordshire Climate Change Action Plan 2021-2025 should be actioned and monitored wherever possible.</p> <p>Development associated with the Local Plan will result in the loss of greenfield land and associated GI to some extent, however national policy and mitigating Local Plan policies will be expected to protect the wider GI network and lead to enhancements in the longer term.</p> <p>It should be noted that the Future Homes Standard will come into effect in 2025 and apply to all new developments, this will be accompanied by changes to Parts L (energy) and F (ventilation) of the Building Regulations. The Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems and high levels of energy efficiency. At the time of writing, it is understood that in December 2023 the government issued a Homes and Buildings Standards consultation, confirming that all new homes will be equipped with low-carbon heating and air source heat pumps. The necessary legislation is expected to be introduced in 2024, ahead of implementation in 2025.</p>
Cultural heritage	<ul style="list-style-type: none"> Impact on heritage assets 	Newcastle-under-Lyme has a range of designated and non-designated historic features. Development proposed within the Local Plan would not be expected to cause significant harm to designated heritage assets and the Plan includes a number of policies which seek to conserve and enhance the historic environment and the distinctive character.
Human health	<ul style="list-style-type: none"> Limited sustainable access to healthcare/leisure facilities and services 	The health of residents within Newcastle-under-Lyme is generally good. However, the rural nature of the borough means that many site end users will be situated further away from healthcare facilities than is recommended to support sustainable communities, with potential for restricted access to essential and emergency healthcare with a likely reliance on private car use to reach the nearest facilities. Pressure on

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
	<ul style="list-style-type: none"> Exposure to air/noise pollution (from AQMA/main road) Limited access to public greenspace Limited access to public greenspace Limited access to PRoW or cycle network 	<p>healthcare facilities is also likely to increase as the population rises, and ages. This could especially present issues when considering the lack of hospitals within the borough. Overall, short, medium, and potentially long-term adverse effects on human health are likely to remain within the Plan period.</p> <p>Air and noise pollution associated with road traffic and AQMAs can have adverse implications for health. Although various Local Plan policies seek to minimise exposure to pollution, the development proposed may lead to a cumulative adverse effect on air quality as discussed in the 'air' section above.</p> <p>Many of the policies would be expected to mitigate any loss or lack of access to public greenspace, as well as creating additional provision for new greenspaces. Various Local Plan policies also seek to provide a range of open spaces and improve the borough's walking and cycling networks, within new sites and relating to existing sites. This is likely to result in positive effects in relation to the promotion of healthy lifestyles and provision of a range of open spaces, recreational facilities and pedestrian / cycling networks for new and existing residents.</p>
Landscape	<ul style="list-style-type: none"> Alteration of landscape character Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt Alteration of views Increased risk of urbanization of the countryside and coalescence Loss of tranquility Threats to important trees 	<p>Development proposed in areas with distinctive landscape characteristics is likely to alter the surrounding landscape character, particularly as a large number of sites are located on previously undeveloped land surrounding rural settlements. The Local Plan seeks to direct development towards previously developed land where possible, although to meet the identified housing requirements, a proportion of growth within the Plan is located on previously undeveloped land, equating to approximately 342ha.</p> <p>Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquility and associated indicators such as dark skies.</p> <p>Various Local Plan policies aim to protect and, where appropriate, enhance the local character and distinctiveness of Newcastle-under-Lyme's landscape through encouraging sensitive design and ensuring that new development proposals have regard to the findings of the published LCSA. However, some allocations lie within areas identified as being of 'high' sensitivity to development, and areas which have a 'strong' or 'moderate' overall contribution to the purposes of the Green Belt. In such areas, the landscape is unlikely to be able to accommodate new development without significant change.</p> <p>Despite the aims of the Local Plan policies to create new, high quality neighbourhoods with in line with landscape and townscape character, there will be an inevitable cumulative loss of rural character associated with urban sprawl and coalescence of settlements. Where a large amount of development is located on previously</p>

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
		<p>undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside.</p> <p>Although a number of development sites coincide or lie adjacent to trees with TPO status, the Local Plan policies are likely to lead to the retainment, conservation and enhancement of these assets.</p>
Population and material assets	<ul style="list-style-type: none"> • Provision of housing to meet local need • Provision of employment opportunities • Access to, and demand on, local services and facilities • Improved community cohesion • Increased household waste generation • Impacts on mineral resources 	<p>The Local Plan is likely to have a positive cumulative effect on the population and the economy, due to the provision of new homes and new jobs to meet the varied needs of the community. This includes jobs delivered through the development of employment sites, as well as jobs that may result from the development of new local centres within residential-led sites. Although issues with housing affordability are likely to continue with Newcastle-under-Lyme and nationally, the Plan will deliver affordable housing and a range of type, tenure and size of homes in line with the identified housing needs.</p> <p>Local and national policy promotes the improvement and integration of public transport, and Local Plan policies seek to improve travel choice and encourage sustainable modes of transport, including public transport, pedestrian and cycle networks. However, many residents in rural areas are likely to rely on private car use for travel, and an increased population may lead to greater pressure on the capacity of key services. A negative and potentially temporary cumulative effect would be expected in terms of accessibility.</p> <p>The Local Plan would be likely to have a positive cumulative effect on social cohesion, due to the provision of social infrastructure and greenspace for recreational activity. The co-location of community facilities and improvements to sustainable transport methods is also likely to promote community integration.</p> <p>The levels of growth set out in the Local Plan are likely to increase household waste generation over the Plan period. Although recycling rates are increasing on a national scale, it is unlikely this will help to significantly decrease waste generation within the Plan area. A long-term permanent negative cumulative effect is expected for waste.</p> <p>The majority of allocated sites coincide with Mineral Safeguarding Areas, which may hinder future potential for mineral extraction. However, the Staffordshire Minerals Local Plan³⁶ sets out a strategy to protect mineral resources from unnecessary sterilisation, which is likely to mitigate any potential adverse impacts.</p>

³⁶ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at:

<https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Documents/The-Minerals-Local-Plan-for-Staffordshire-2015-2030.PDF> [Date accessed: 28/06/24]

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
Soil	<ul style="list-style-type: none"> Loss of soil resources and BMV land Impact on ecosystem services 	<p>Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs a number of important ecosystem services and supports a diverse range of habitats. Although Local Plan policies are expected to mitigate some impacts on the loss of soil biome through GI provision, and aim to firstly direct development to areas of previously developed land, the rural nature of the borough has led to the allocation of sites on greenfield land, including some high quality agricultural land. The proposed site allocations are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, and up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services.</p>
Water	<ul style="list-style-type: none"> Fluvial and surface water flood risk Reduction in water quality and ecosystem services Increase demand for water and wastewater management 	<p>Regarding flood risk, national policies and guidance in combination with various Local Plan policies will help to ensure development proposals do not exacerbate flood risk in the Plan area. Buildings will be located away from areas of flood risk wherever possible, and SuDS and GI will be used to ensure surface water drainage replicates that of greenfield land.</p> <p>The increased population in the Plan area would be expected to increase demand on water supply and management. The WCS (2024)³⁷ indicates that Severn Trent Water do not expect water supply infrastructure to be a constraint to development within Newcastle-under-Lyme, and water efficiency is increasing nationally. Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the RBMP, WRMP and CAMS in line with the EU Water Framework Directive.</p> <p>Development within the allocated sites has potential to lead to an increased risk of watercourse and groundwater contamination, from a small number of allocations located near rivers or within an SPZ. The WCS (2024)³⁸ has identified potential impacts for downstream water quality as a result of growth within the Plan area. In combination with climate change and increased storm events, this is likely to lead to increased potential for overflows of untreated sewage and storm water into nearby waterbodies.</p> <p>A long-term cumulative adverse effect has been identified in terms of water quality.</p>

³⁷JBA Consulting (2024) Stage 2 Water Cycle Study, Newcastle-under-Lyme. Draft Report, July 2024. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 24/07/24]

³⁸ Ibid.

Monitoring

- N128. The SA also discusses the importance of a monitoring programme to help ensure that adverse impacts of the Local Plan are identified, investigated and potentially avoided, mitigated or compensated. When opportunities for improving the sustainability performance of the Plan arise over time, monitoring helps to ensure that these opportunities are recognised and taken advantage of.
- N129. Some suggested monitoring proposals are set out in **Table N.24** for NuLBC to consider in the implementation of the Local Plan.

Table N.24: *Proposals for monitoring adverse sustainability impacts of the Local Plan*

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Air	AQMAs	Annually, Plan area wide	Decrease
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of Planning Approvals granted contrary to the advice of Natural England or Staffordshire Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Renewable energy generation	Annually, Plan area wide	Increase
Climatic factors	Fluvial flood risk along Lyme Brook	Annually, Plan area wide	Decrease
Climatic factors	Surface water flood risk within Newcastle-under-Lyme and Kidsgrove	Annually, Plan area wide	Decrease
Cultural heritage	Number of Conservation Area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP Surgeries	Annually, Plan area wide	Increase
Landscape	Quantity of development in the open countryside	Annually, Plan area wide	Zero
Landscape	Change in tranquility in the open countryside	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Newcastle-under-Lyme within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste generation	Annually, Plan area wide	Decrease

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Population and material assets	Loss of Mineral Safeguarding Areas	Annually, Plan area wide	Zero
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
Soil	Number of dwellings built on BMV land (Grades 1, 2 or 3a ALC)	Annually, Plan area wide	Decrease
Water quality	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero
Water quality	Quality of watercourses	Annually, Plan area wide	Increase
Water quality	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water quality	Water efficiency in new homes	Annually, Plan area wide	Increase
Water quality	Water availability for extraction	Annually, Plan area wide	Increase

Consultation and next steps

- N130. The Regulation 19 SA Report will be published alongside the Publication Draft Version of the Newcastle-under-Lyme Local Plan.
- N131. A minimum of six-week period of consultation will be undertaken by NuLBC to offer statutory consultees, stakeholders, organisations and individuals an opportunity to submit representations regarding the Local Plan, as well as the supporting evidence including this SA Report.
- N132. Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.



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Sustainability Appraisal of the Newcastle-under-Lyme Local Plan (2020-2040)

Volume 2 of 3: Regulation 19 SA Report

July 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan 2020-2040

Including: Strategic Environmental Assessment and
Equality Impact Assessment

Volume 2 of 3: Regulation 19 SA Report

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Front Cover: The Trent and Mersey Canal, Kidsgrove, Newcastle-under-Lyme. Credit: Andrew Chisholm, Shutterstock.

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The conclusions below are based on the best available information, including information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published.

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Acronyms & abbreviations

A&E	Accident and Emergency
AA	Appropriate Assessment
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BMV	Best and Most Versatile
BREEAM	Building Research Establishment Environmental Assessment Method
CEA	Cumulative Effects Assessment
CO₂	Carbon Dioxide
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
HEDNA	Housing and Economic (Development) Needs Assessment
EIA	Environmental Impact Assessment
EU	European Union
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographic Information Systems
GP	General Practitioner
GTTS	Gypsies, Travellers and Travelling Showpeople
HER	Historic Environment Record
IMD	Indices of Multiple Deprivation
IRZ	Impact Risk Zone
km	Kilometre
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LCZ	Low and zero carbon
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LSOA	Lower Super Output Area
LVA	Landscape and Visual Appraisal
LVIA	Landscape and Visual Impact Assessment
MHCLG	Ministry of Housing, Communities and Local Government
NCA	National Character Area
NERC	Natural Environment and Rural Communities
NHS	National Health Service
NNR	National Nature Reserve
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
NuLBC	Newcastle-under-Lyme Borough Council
NVQ	National Vocational Qualification
OAN	Objectively Assessed Need

ODPM	Office of the Deputy Prime Minister
PINS	Planning Inspectorate
PPG	Planning Practice Guidance
PPP	Policies, Plans and Programmes
PRoW	Public Rights of Way
RBMP	River Basin Management Plan
RIGS	Regionally Important Geological and Geomorphological Site
RPG	Registered Park and Garden
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBI	Site of Biological Importance
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
SWFR	Surface water flood risk
TAG	Transport Analysis Guidance
WCS	Water Cycle Study
WwTW	Wastewater Treatment Works

1 Introduction

1.1 Purpose of this report

1.1.1 Lepus Consulting Ltd (Lepus) has been instructed by Newcastle-under-Lyme Borough Council (NuLBC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA) and Equality Impact Assessment (EqIA), for the Newcastle-under-Lyme Local Plan (2020-2040).

1.1.2 This Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform NuLBC's preparation of the Newcastle-under-Lyme Local Plan. This report follows on from the Regulation 18 SA Report (2023)¹ which was published for consultation alongside the 'First Draft Local Plan' between 19th June and 14th August 2023, and the SA Scoping Report (2021) which was subject to consultation between 7th June and 12th July 2021, and subsequently updated in August 2021².

1.1.3 There are four key purposes of the SA process at this stage of the plan making process are shown in **Figure 1.1**.

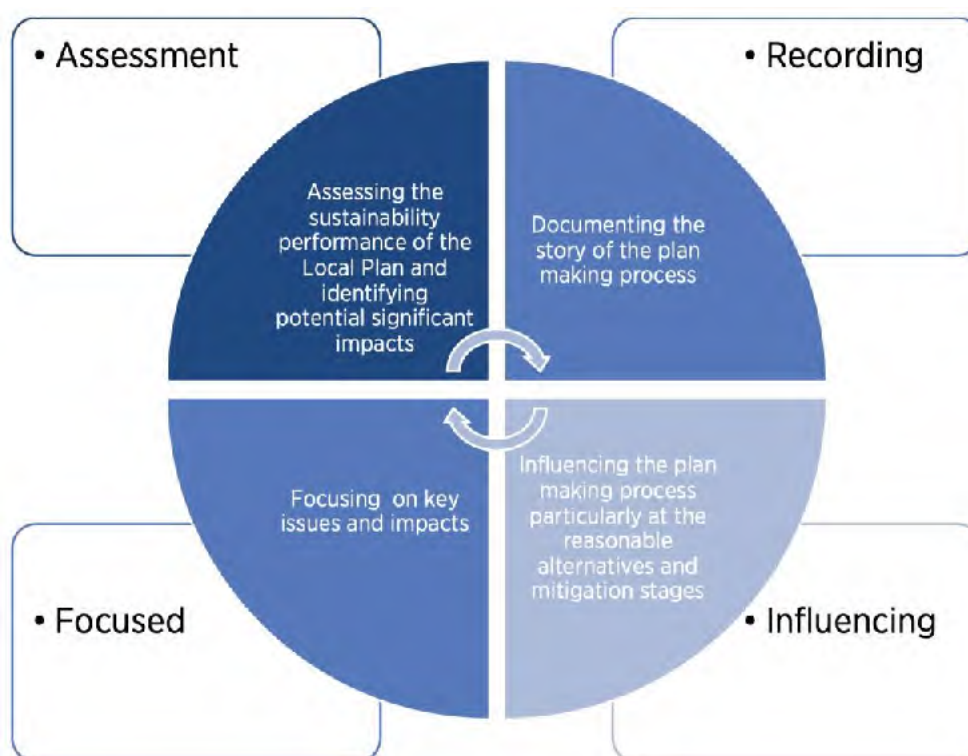


Figure 1.1: Key purposes of the SA process

¹ Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volumes 1-3. May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 31/01/24]

² Newcastle-under-Lyme Borough Council (2021). Newcastle-under-Lyme Borough Council Local Plan (2020-2040). SA Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan/2> [Date accessed: 22/01/24]

- 1.1.4 This SA report is one of a series of reports that have been prepared to document the iterative SA process. Besides other purposes, such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. **Chapter 2** provides further details of the SA process to date.

1.2 Sustainability Appraisal

- 1.2.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies³. 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.
- 1.2.2 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 tests of soundness have been met. SA should be applied as an iterative process informing the development of the plan.

1.3 Strategic Environmental Assessment

- 1.3.1 Strategic Environmental Assessment (SEA) seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. Its purpose is to provide for 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. SEA considers only the environmental effects of a plan, whereas sustainability appraisal considers a plan's wider economic and social effects in addition to its potential environmental impacts⁴.
- 1.3.2 The SEA procedure can be summarised as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared.

³ DLUHC and MHCLG (2021). Government guidance on plan making. Available at: <https://www.gov.uk/guidance/plan-making> [Date accessed: 06/01/24]

⁴ DLUHC and MHCLG (2020) Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 06/01/24]

1.4 Integrated approach to SA and SEA

- 1.4.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive⁵). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633⁶).
- 1.4.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations necessitate an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.
- 1.4.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012.

1.5 Legislative context

- 1.5.1 When submitting their local plan to the Secretary of State, section 19(5) of the Planning and Compulsory Purchase Act⁷ requires that local planning authorities (LPAs) must have prepared and be able to submit an SA at the same time.
- 1.5.2 The Environmental Assessment of Plans and Programmes Regulations⁸ (SEA Regulations) require that Strategic Environmental Assessments (SEA) be prepared for a wide range of plans and programmes, including Local Plans.
- 1.5.3 Planning Practice Guidance (PPG) advocates that the SA process should integrate the requirements of the SEA Regulations. On this basis, this SA report incorporates the requirements of the SEA regulations.
- 1.5.4 PPG on SEA and SA⁹ states: "*Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues*".

⁵ Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 06/01/24]

⁶ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 06/01/24]

⁷ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 03/07/24]

⁸ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/07/24]

⁹ MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 03/07/24]

1.6 Equality Impact Assessment

- 1.6.1 The aim of the Equality Act (2010)¹⁰ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and thus includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and employment and do all they can to promote equality.
- 1.6.2 EqIA is a systematic and evidence-based tool, which enables the Newcastle-under-Lyme Local Plan to consider the likely impact of work on different groups of people who share a protected characteristic¹¹, identified in the Equality Act. Completion of EqIAs is a legal requirement under race, disability and gender equality legislation.
- 1.6.3 The EqIA has been considered under **Chapter 13: Population and Material Assets**, with the full EqIA screening of Local Plan policies presented in **Appendix K**.

1.7 How to read and understand the R19 SA Report

- 1.7.1 This report should be read alongside the Publication Draft Version of the Newcastle-under-Lyme Local Plan, also called the 'Regulation 19 Pre-Submission Draft Plan'.
- 1.7.2 The contents of this SA Report, including the various appendices which provide essential contextual information to the main body of the report, are listed as follows:
- **VOLUME 1: Non-Technical Summary** provides a summary of the Regulation 19 SA work.
 - **VOLUME 2: Main SA Report** (this document)
 - **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the Local Plan and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the Plan.
 - **Chapter 4** sets out the SA methodology.
 - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
 - **Chapter 6** presents details on the preferred approach as set out in the Plan.
 - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
 - **Chapter 16** presents the cumulative effects assessment.
 - **Chapter 17** sets out a range of monitoring recommendations for the Local Plan.
 - **Chapter 18** summarises ways in which the SA has influenced the Local Plan throughout the plan making process, including through recommendations made in the SA.
 - **Chapter 19** outlines the conclusions, residual effects and next steps.

¹⁰ Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 03/07/24]

¹¹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

○ **VOLUME 3: Appendices**

- **Appendix A** presents the SA Framework.
- **Appendix B** presents a review of other relevant policies, plans and programmes (PPPs).
- **Appendix C** presents the consultation responses received during each stage of the SA process from statutory consultees and other interested parties.
- **Appendix D** presents the assessment of the latest growth direction option, residential and employment growth options, growth scenarios, and safeguarded land options.
- **Appendix E** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic specific methodologies and assumptions used to assess reasonable alternative sites.
- **Appendix F** presents the assessment of 36 new/amended reasonable alternative sites (pre-mitigation) identified at this stage.
- **Appendix G** presents the assessment of the Local Plan policies (strategic and non-strategic policies).
- **Appendix H** summarises the assessment of all 177 reasonable alternative sites assessed through the SA process (pre-mitigation), considers the potential mitigating influence of the Local Plan policies, and presents the post-mitigation assessment of all 177 reasonable alternative sites.
- **Appendix I** presents NuLBC's outline reasons for selection and rejection of all reasonable alternative sites which have been identified, described and evaluated through the SA process.
- **Appendix J** presents the assessment of the Local Plan site allocation policies.
- **Appendix K** presents the Equality Impact Assessment (EqIA) screening of policies.

2 About the Plan and the sequencing of the SA process

2.1 Geography of the Plan area

- 2.1.1 Newcastle-under-Lyme Borough comprises approximately 21,095ha and is located within the County of Staffordshire, between Manchester and Birmingham. The City of Stoke-on-Trent lies adjacent to Newcastle-under-Lyme to the east, with the north-east of the borough falling within the Stoke-on-Trent Green Belt. The borough has an estimated population of 123,300 as of 2021¹². The administrative boundary of the borough is shown in **Figure 2.1** and its location within the West Midlands in **Figure 2.2**.
- 2.1.2 The strategic centre and market town of Newcastle-under-Lyme lies in the north east of the borough, with the town of Kidsgrove to the north, surrounded by rural centres.
- 2.1.3 The Peak District National Park lies approximately 9.8km to the north east of the borough. The borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent.
- 2.1.4 The borough contains two Ramsar Sites recognised for their internationally important wetlands: Midland Meres and Mosses Phase 1 and 2 at Betley Mere. A range of statutory and non-statutory biodiversity designations can also be found in the borough, including Sites of Special Scientific Interest (SSSI), several stands of ancient woodland, Local Nature Reserves (LNRs) and local Sites of Biological Importance (SBIs), as well as a range of priority habitats.
- 2.1.5 Several watercourses pass through the borough including the Lyme Brook (a tributary of the River Trent) in the east through Newcastle-under-Lyme Town Centre, as well as the River Lea in the east. Some areas of Flood Zone 2 and 3 are present alongside these watercourses.
- 2.1.6 Newcastle-under-Lyme has a rich historic environment, with a suite of cultural heritage designations including 365 Listed Buildings (Grade I, II* and II), 13 Scheduled Monuments (SMs), two Registered Parks and Gardens (RPGs) and several conservation areas, as well as a range of non-designated locally important buildings and structures.
- 2.1.7 Comprehensive environmental, social and economic baseline information for the Plan area is set out in the SA Scoping Report¹³.

¹² Office for National Statistics (2021). How life has changed in Newcastle-under-Lyme: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000195/#> [Date accessed: 15/01/24]

¹³ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s35932/SA%20Scoping%20Final%20002.pdf> [Date accessed: 15/01/24]

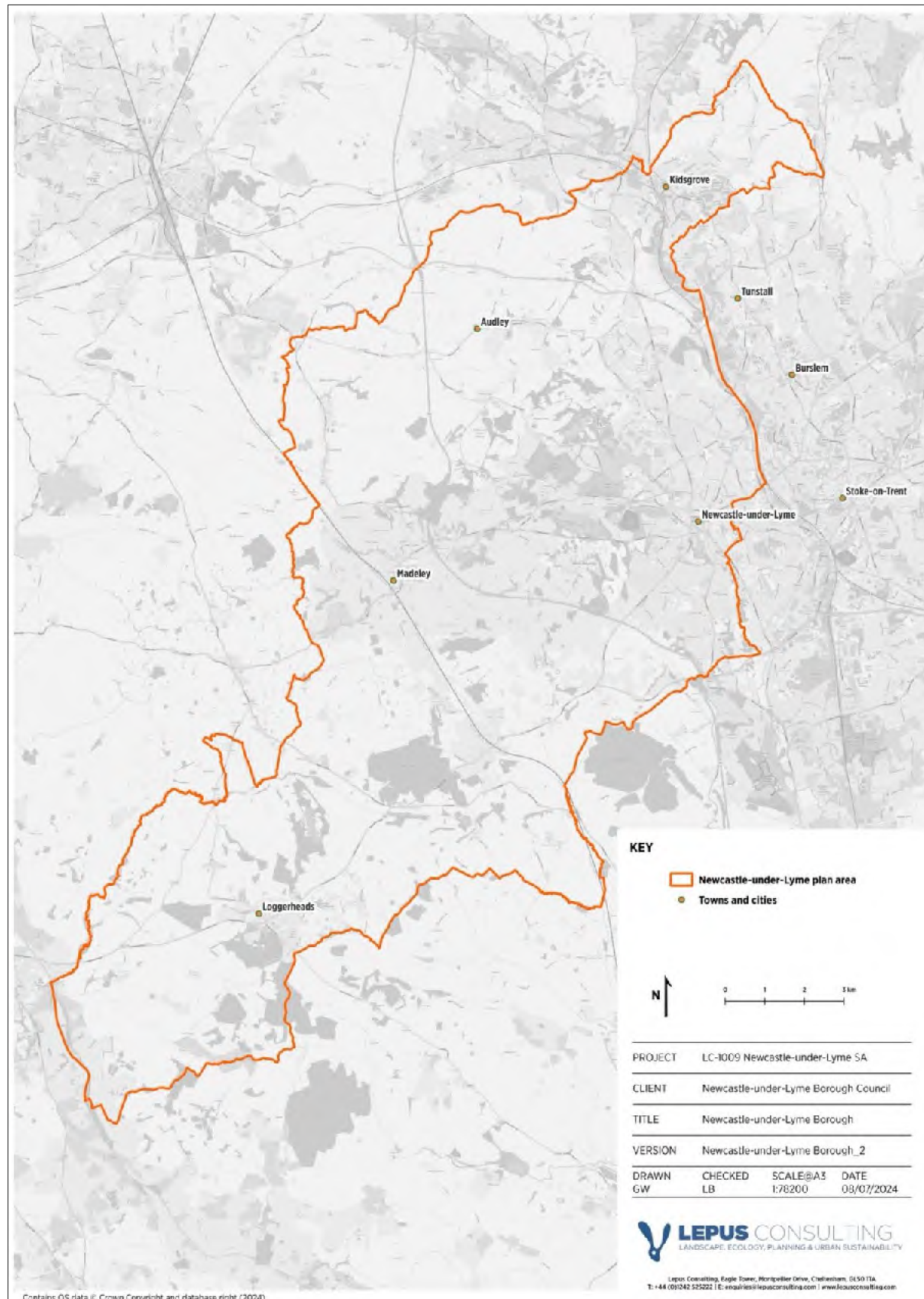


Figure 2.1: Map of Newcastle under-Lyme Local Plan area

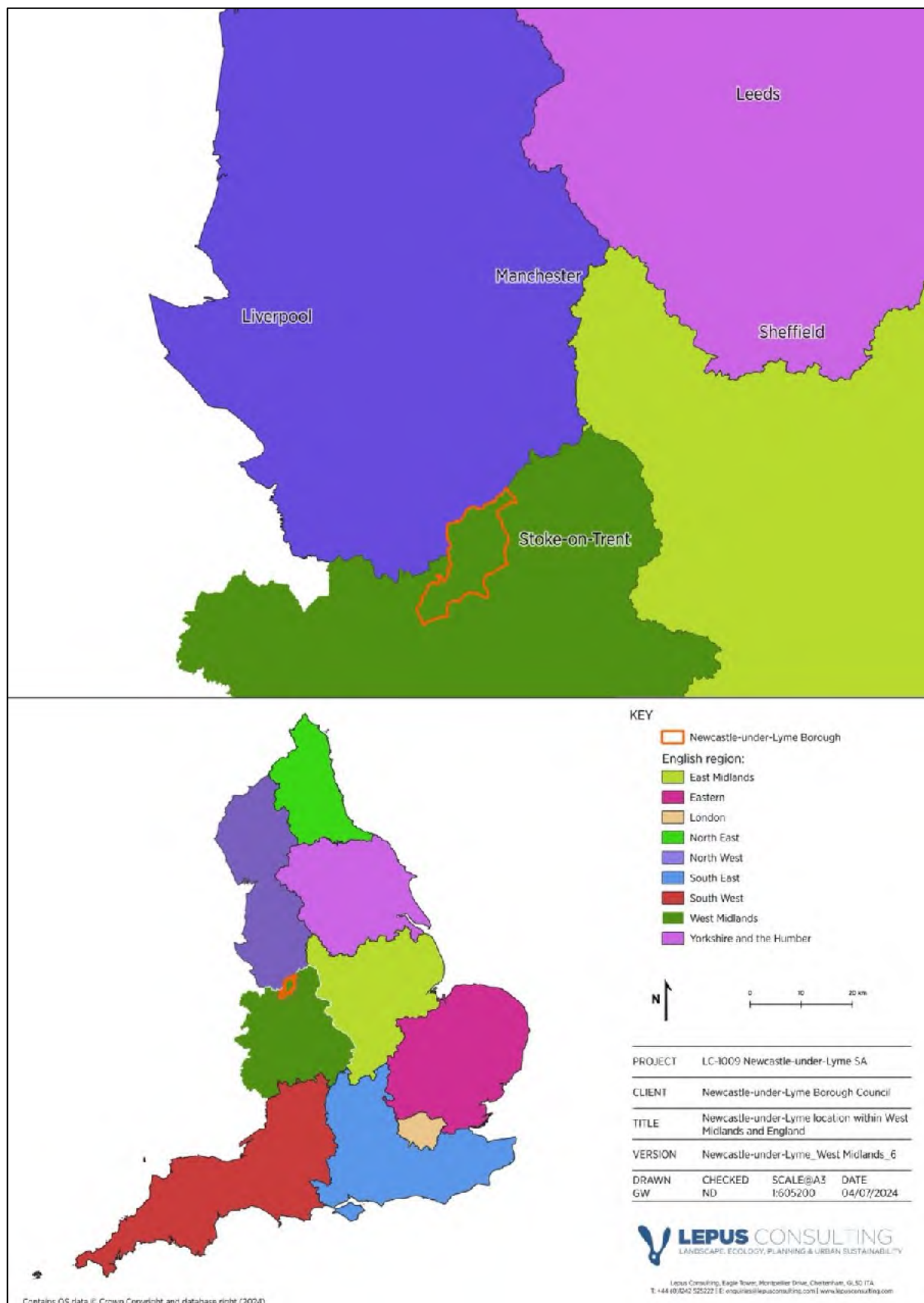


Figure 2.2: The location of Newcastle under-Lyme Borough in the West Midlands

2.2 The Newcastle-under-Lyme Local Plan

- 2.2.1 The UK government requires that local plans should be reviewed every five years and updated as necessary. In 2021, NuLBC decided to begin preparation of a new local plan for Newcastle-under-Lyme Borough, following the ending of work on the Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan.
- 2.2.2 The emerging Local Plan for Newcastle-under-Lyme will set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure. The Plan will also set out a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- 2.2.3 The first stage of plan preparation was known as 'Issues and Strategic Options'. The Issues and Strategic Options document¹⁴ set out the key issues for Newcastle-under-Lyme such as the need for housing, employment and other development and sought views from the public and stakeholders on various options including the growth figures to pursue and the broad locations for new development.
- 2.2.4 The Issues and Strategic Options Regulation 18 Consultation was held between 1st November 2021 and 24th January 2022. Following the consultation on issues and strategic options, a further Regulation 18 consultation has been held on the 'First Draft' Local Plan between 19th June and 14th August 2023¹⁵.
- 2.2.5 NuLBC have considered responses and comments on the Plan received through the Regulation 18 consultations, as well as the latest evidence base information, and prepared the Publication Draft Local Plan for Regulation 19.
- 2.2.6 The Local Plan will seek to:
- Reflect the issues that have arisen since adoption of the Council's current development plan documents;
 - Provide for the additional new housing and other development that will be required to meet future identified needs;
 - Establish a Plan period up to 2040 in order to ensure that there will be a minimum 15-year time horizon; and
 - Demonstrate sustainable development that helps combat climate change and carbon reduction.

¹⁴ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 04/07/24]

¹⁵ Newcastle-under-Lyme Borough Council (2023) Newcastle-under-Lyme First Draft Local Plan 2020-2040. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37506/section/> [Date accessed: 31/05/24]

- 2.2.7 Once adopted, the Newcastle-under-Lyme Local Plan will replace the current planning policies set out in the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies from the Newcastle-under-Lyme Local Plan 2011 (adopted 2003)¹⁶.
- 2.2.8 Thirteen strategic objectives have been proposed for the emerging Local Plan as replicated in **Figure 2.3**. The strategic objectives have been revised throughout the plan-making process and have been assessed against the SA Objectives in the accompanying SA Report at each stage. The strategic objectives have been identified to result in positive effects across the SA Framework. The full appraisal of the strategic objectives is provided in **Appendix G**, in line with the methodology as discussed further in **Chapter 4**.

¹⁶ Newcastle-under-Lyme Borough Council – Current development plan. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/current-development-plan> [Date accessed: 03/07/24]

SO-1 (I)	<ul style="list-style-type: none"> • Create development with a sense of place and character, which naturally enhances human health and well-being through utilising sustainable construction methods, facilitating healthy lifestyle choices and supporting sustainable transport connections
SO-2 (II)	<ul style="list-style-type: none"> • Diversify the Borough's employment base and deliver employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, supporting technology and the green economy to generate more skilled jobs for local people.
SO-3 (III)	<ul style="list-style-type: none"> • Further investment in the regeneration and renewal of the distinctive market towns of Newcastle-under-Lyme and Kidsgrove to promote attractive public spaces, improvement and enhancement of the streetscape, independent stores, great restaurants, bars and cafes, a higher mix of residential and more alternative uses which draw in visitors and create safe vibrant centres. To support visitors and residents with access to healthier food choices and accessible, sustainable green spaces and active travel options to support health and wellbeing.
SO-4 (IV)	<ul style="list-style-type: none"> • Reduce the Borough's carbon footprint and mitigate the impact of climate change in the Borough ensuring local policies promote sustainability and harness opportunities for renewable energy generation, carbon sequestration, and greener construction.
SO-5 (V)	<ul style="list-style-type: none"> • Provide a mix of housing types which are attractive to people who want to live and work in the Borough and to provide aspirational housing which is well designed, safe, secure and adaptable.
SO-6 (VI)	<ul style="list-style-type: none"> • Support the vitality of rural villages, preserving and enhancing the special character which is valuable to each local community whilst enabling sustainable growth to improve affordability and to provide choice in housing types for local people.
SO-7 (VII)	<ul style="list-style-type: none"> • Support and enable active and sustainable travel across the Borough with connections between our towns and villages. This will include raising the profile and improving the facilities of Kidsgrove Railway Station and improving connectivity as a significant sustainable transport hub in the Borough.
SO-8 (VIII)	<ul style="list-style-type: none"> • Provide a clear local strategic planning framework to support the development of Neighbourhood Plans which will set out the more detailed policies to guide development in the Borough.
SO-9 (IX)	<ul style="list-style-type: none"> • Support physical activity, including sport and recreation. Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages, one of the Borough's greatest unique assets to help enhance health and wellbeing. To support waterways, as a significant blue and green infrastructure in the Borough.
SO-10 (X)	<ul style="list-style-type: none"> • Enable the growth of Keele University to support its vision for increasing student numbers and expanding its capacity for research and development; supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area.
SO-11 (XI)	<ul style="list-style-type: none"> • Deliver targeted development seeking a balance between growth and conservation to ensure that the Borough retains its identity as both an urban and rural Borough which provides the ideal setting for people wanting to enjoy countryside, village and town life in the West Midlands. To provide targeted infrastructure improvements which are resilient and adaptable to support sustainable development in our towns and villages.
SO-12 (XII)	<ul style="list-style-type: none"> • Protect the Green Belt, except where exceptional circumstances justify strategic Green Belt release to meet strategic needs identified by the Plan.
SO-13 (XIII)	<ul style="list-style-type: none"> • Protect and enhance the historic environment of our Borough.

Figure 2.3: Strategic objectives of the Newcastle-under-Lyme Local Plan

2.3 Sustainability Appraisal alongside the plan stages: Iteration

- 2.3.1 **Figure 2.4** provides a summary of the main plan making stages for NuLBC, and includes SA outputs that were prepared at each stage.
- 2.3.2 The preparation of a Scoping Report was the first phase of the SA process. The scoping process set the criteria for assessment (including the SA Objectives – see **Appendix A**) and established the baseline data and other information, including a review of relevant policies, programmes and plans (PPPs – see **Appendix B**). The scoping process involved an overview of key issues for the local area, highlighting areas of potential conflict with the emerging Plan. The output of the scoping phase was the SA Scoping Report prepared by NuLBC in 2021¹⁷.
- 2.3.3 The next SA output was the Regulation 18 SA prepared by Lepus in 2023¹⁸, the purpose of which was to assess the sustainable development implications of proposals presented in the 'First Draft Local Plan' for Newcastle-under-Lyme Borough. NuLBC identified a suite of 141 reasonable alternative development sites, and a set of 23 draft policies, which were assessed in the SA process and presented in the Regulation 18 SA Report. The Regulation 18 SA also included an assessment of 'options' that were identified by NuLBC through the previous plan-making phase known as 'Issues and Strategic Options'¹⁹, including three housing growth options, three employment growth options, and six growth direction options.
- 2.3.4 The Regulation 19 SA Report (this report) includes a summary of the SA process to date and has been prepared to help inform the examination stage of the preparation of the Newcastle-under-Lyme Local Plan. The SA Report has been prepared to meet the requirements of an SEA Environmental Report as per the Strategic Environmental Assessment Regulation 2004 (SI1633). It also sets out the assessment of reasonable alternatives that have been identified by NuLBC since the Regulation 18 stage, taking into account the latest available evidence and consultation responses received; these include: 36 new/amended reasonable alternative sites (see **Appendix F**), six housing and employment growth options, one 'growth direction option', four 'growth scenario options' and three safeguarded land options (see **Appendix D**).
- 2.3.5 **Appendix C** presents a summary of issues raised through comments received during each stage of consultation from the statutory consultees: the Environment Agency, Historic England and Natural England, and how they have been considered within the subsequent SA stage.

¹⁷ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s35932/SA%20Scoping%20Final%20002.pdf> [Date accessed: 15/01/24]

¹⁸ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

¹⁹ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 18/04/24]

- 2.3.6 Information regarding NuLBC's selection and rejection of reasonable alternatives that were evaluated throughout the SA process are documented within this Regulation 19 SA Report (see in particular **Chapter 5** and **Appendix I**).



Figure 2.4: Stages in the plan making process accompanied by SA outputs

2.4 Meeting the requirements of the SEA Regulations

- 2.4.1 There are certain requirements that this report must satisfy in order for it to qualify as an 'environmental report', as set out in the SEA Regulations. These requirements, and where in the report they have been met, are presented in **Figure 2.5**.



Figure 2.5: Strategic Environmental Assessment checklist

3 Evolution of the environment without the Plan

3.1 Overview

3.1.1 The SEA Regulations requires the Environmental Report to present *"information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"*.

3.1.2 In the absence of the Local Plan, no new plan-led development would occur within the Plan area over and above that which is currently proposed in the adopted Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy and the saved policies from the Newcastle-under-Lyme Local Plan 2011. In this scenario, an appeal-led system would predominate. The nature and scale of development that may come forward under an appeal-led system would be uncertain. In a 'no plan' scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place.

3.1.3 **Table 3.1** considers the likely evolution of the baseline within Newcastle-under-Lyme Borough in the absence of the Plan. This takes into account information gathered at the Scoping stage and more up-to-date data and statistics.

Table 3.1: Likely evolution without the Plan

Theme	Likely evolution without the Plan
Air	<ul style="list-style-type: none"> Current national trends suggest that NO₂ concentrations are declining in the borough's three AQMAs. 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. Traffic and congestion are likely to increase with population growth, with implications for air quality, residents and wildlife within 200m of busy roads. Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Sites designated for their national and international biodiversity and/or geodiversity value will continue to benefit from legislative protection. Biodiversity and wildlife sites will likely continue to benefit from the objectives and measures set out in the Staffordshire Biodiversity Action Plan including species action plans and habitat action plans to restore, protect, and enhance important features. There may be increased potential for negative impacts on biodiversity within locally designated sites which benefit from local planning policy framework.

Theme	Likely evolution without the Plan
Climatic factors	<ul style="list-style-type: none"> The frequency and severity of flooding is set to increase due to the impacts of climate change, in particular risk would expect to increase along the Lyme Brook. The risk of surface water flooding will depend on the size, nature and extent of non-porous built surface cover in the Plan area in the future. However, the high risk of surface water flooding in the borough's urban areas will likely continue to be an issue. The urban area of Newcastle and Kidsgrove has been identified in the Flood Risk Management Strategy as one of the top ten urban areas at risk of surface water flooding in the county. Per capita emissions are likely to decrease over time as renewable energy increases its market share. The Future Homes Standard will come into effect in 2025 and apply to all new developments, this will be accompanied by changes to Parts L (energy) and F (ventilation) of the Building Regulations. The Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems and high levels of energy efficiency. At the time of writing, it is understood that a full technical specification for the Future Homes Standard will be consulted on in 2023, with the necessary legislation introduced in 2024, ahead of implementation in 2025.
Cultural heritage	<ul style="list-style-type: none"> Nationally designated heritage assets will continue to benefit from legislative protection. Locally identified heritage assets would potentially be afforded less protection.
Human health	<ul style="list-style-type: none"> The life expectancy of men and women is anticipated to rise over time. Some residents will continue to need to travel relatively far, likely by driving, to reach important health facilities and services. However, this inequality may be addressed to some extent by the Local Transport Plan. Some residents will continue to have poor accessibility to the cycle network and walking zones. However, this inequality may be addressed to some extent by the Local Transport Plan. Health-related issues including obesity, diabetes, cardiovascular disease and liver disease will likely continue to rise aligning with current trends in the borough.
Landscape	<ul style="list-style-type: none"> The Green Belt will continue to benefit from legislative protection. The borough will remain a predominantly rural and agricultural landscape. There may be increased development pressure on the open countryside areas outside the Green Belt, particularly to the south of the borough.

Theme	Likely evolution without the Plan
Population and material assets	<ul style="list-style-type: none"> • The number of jobs in the borough is expected to increase, although at a slower rate than surrounding authorities. • The number of businesses is expected to increase at the current rate, comparatively slower than surrounding authorities. • There is an increasing lack of available supply of employment land to meet local and wider market demand. • House prices are expected to increase, owing to slower housing stock growth than the West Midlands and national averages. • Less control is expected over the location of future housing, including increased pressure on areas of open countryside. • Provision of affordable and specialist housing is likely to be reduced, as well as an inability to better balance the housing market through the provision of more small homes. • Rates of deprivation are likely to continue to decline. • There may be fewer opportunities to enhance community benefits associated with plan-led housing proposals. • Less ability to refine the housing stock is expected to meet the changing demands of existing residents. This includes the provision of housing for the elderly. • The population of the borough is expected to continue to increase. This will place greater pressure on the capacity of key services and amenities, including health and leisure facilities and housing. • In the absence of development proposed in the Local Plan, there could potentially be a rise in homelessness due to an unmet housing need.
Soil	<ul style="list-style-type: none"> • Soil is a non-renewable resource that would continue to be lost. • Rates of soil erosion and loss of soil fertility are likely to continue to rise due to the impacts of agriculture and climate change.
Water	<ul style="list-style-type: none"> • Water demand may increase over time as the population grows. • Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through relevant River Basin Management Plans (RBMPs), Water Resource Management Plans (WRMPs) and Catchment Abstraction Management Strategies (CAMS) in line with the Water Framework Directive.

4 Methodology

4.1 Scope of the Sustainability Appraisal

4.1.1 The purpose of the SA Scoping Report is to establish the scope of the sustainability appraisal. It includes information about:

- Relevant plans, programmes and their environmental objectives which may have a bearing on the SA of the Local Plan (see **Appendix B** for further information);
- Baseline information;
- Environmental issues and problems; and
- The SA Framework (see **Appendix A**).

4.1.2 The SA Scoping Report for the Local Plan was prepared by NuLBC in 2021. The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency between 7th June and 12th July 2021. Following consideration of comments received during the consultation, an updated version of the Scoping Report was published in August 2021²⁰. The comments received during the Scoping consultation have also informed the preparation of the subsequent SA outputs, including this Regulation 19 SA Report, as set out in **Appendix C**.

4.1.3 The appraisal uses objective geographic information relating to environmental receptors, the SA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

4.1.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations²¹. The SA Objectives and the SEA Topics to which they relate are set out in **Table 4.1**.

4.1.5 Each SA Objective is considered when appraising Local Plan site allocations, policies and reasonable alternatives. The order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

²⁰ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s35932/SA%20Scoping%20Final%20002.pdf> [Date accessed: 15/01/24]

²¹ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including “issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).”

Table 4.1: Summary of the SA Objectives

No.	SA Objective	Relevance to SEA Regulations
1	Climate Change: 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.	Climatic factors
2	Air: To improve air quality, creating cleaner and healthier air.	Air
3	Biodiversity, Flora and Fauna: Protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity.	Biodiversity, flora and fauna
4	Natural Resources and Waste: To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources, ensure the efficient use of mineral resources and reduce waste.	Soil and material assets
5	Flooding: To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems (SuDS).	Water, human health and material assets
6	Water: To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive.	Water
7	Cultural Heritage: To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings.	Cultural heritage
8	Landscape: To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.	Landscape
9	Health and Wellbeing: To increase life expectancy and improve the health and mental wellbeing of the population overall; and to maintain and enhance the quality, accessibility and connectivity of open space and blue-green infrastructure.	Human health
10	Equality: To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, including availability of a warm, safe home are available to all sectors of the population with particular emphasis on deprived neighbourhoods.	Population
11	Transport and Accessibility: To reduce the need to travel while increasing transport choice including the promotion of safe and efficient public transport and active travel options at the heart of a transport network that provides accessibility for all.	Population and climatic factors
12	Economy: To protect and enhance the vitality and viability of centres and ensure the provision of a range of employment land and premises that meets the needs of the business community and provides retail opportunities for local communities.	Population

4.2 Best practice guidance

4.2.1 Government policy recommends that both SA and SEA are undertaken under a single SA process, which incorporates the requirements of the SEA Regulations. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment²².
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive²³.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)²⁴.
- DLUHC and Ministry of Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)²⁵.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²⁶.

4.3 Appraisal process

4.3.1 The purpose of this document is to provide an appraisal of the Local Plan including reasonable alternatives in line with Regulation 12 of the SEA Regulations²⁷ which states that:

4.3.2 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*

²² European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 03/07/24]

²³ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf [Date accessed: 03/07/24]

²⁴ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 03/07/24]

²⁵ DLUHC & MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 03/07/24]

²⁶ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 03/07/24]

²⁷ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/07/24]

- 4.3.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 4.1**).

Box 4.1: Schedule 1 of the SEA Regulations²⁸

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets out a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

4.4 Impact assessment and determination of significance

- 4.4.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

4.5 Sensitivity

- 4.5.1 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and, for example, if impacts will affect designated areas or landscapes.

²⁸ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/07/24]

- 4.5.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 4.2**. For most receptors, sensitivity increases with geographic scale.

Table 4.2: *Impact sensitivity*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the borough and neighbourhood scale.

4.6 Magnitude

- 4.6.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 4.3**).

Table 4.3: *Impact magnitude*

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> Frequent and short-term; Frequent and reversible; Long-term (and frequent) and reversible; Long-term and occasional; or Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> Reversible and short-term; Reversible and occasional; or Short-term and occasional.

4.7 Significant effects

- 4.7.1 A single value from **Table 4.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.
- 4.7.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table 4.4: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- 4.7.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a spatial option in terms of the relevant SA Objective, the precautionary principle²⁹ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.
- 4.7.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 4.7.5 Significance of effect has been categorised as minor or major. **Table 4.4** sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 4.7.6 Each reasonable alternative that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 4.4**. Likely impacts are not intended to be summed.
- 4.7.7 It is important to note that the assessment scores presented in **Table 4.4** are high level indicators. The assessment narrative text should always read alongside the significance scores.
- 4.7.8 A number of topic-specific methodologies and assumptions have been applied to the appraisal process for reasonable alternative sites against specific SA Objectives to aid transparency and allow for a consistent approach to site assessments (see **Appendix E**). These should be borne in mind when considering the assessment findings.

4.8 Limitations of predicting effects

- 4.8.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 4.8.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

²⁹ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

- 4.8.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.
- 4.8.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. The appraisal of the Local Plan is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.
- 4.8.5 All data used is secondary data obtained from the Council or freely available on the internet.

5 Reasonable alternatives

5.1 Context

- 5.1.1 Regulation 12 of the SEA Regulations³⁰ states that: *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme"*.
- 5.1.2 PPG³¹ states that: *"Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made"*.
- 5.1.3 The Council has therefore demonstrated how they have identified, described and evaluated reasonable alternatives in the sustainability appraisal report (which includes the requirements of an SEA environmental report) as part of the plan making process for the Local Plan. The following sections of this chapter document the process of identifying and evaluating different types of reasonable alternative, when and where the Council considered reasonable alternatives in the plan making process, and how the SA influenced the plan-making.

5.2 Different types of reasonable alternatives

- 5.2.1 It is possible to derive reasonable alternatives for different aspects of a local plan. There is no prescribed formula or procedure about which aspects of the local plan that require reasonable alternatives.
- 5.2.2 In the case of the Newcastle-under-Lyme Local Plan, all reasonable alternatives have been identified and described by the Council's plan makers. **Figure 5.1** below outlines the definitions for the different types of reasonable alternatives assessed throughout the SA process.

³⁰ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date accessed: 03/07/24]

³¹ MHCLG (2020) Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 03/07/24]

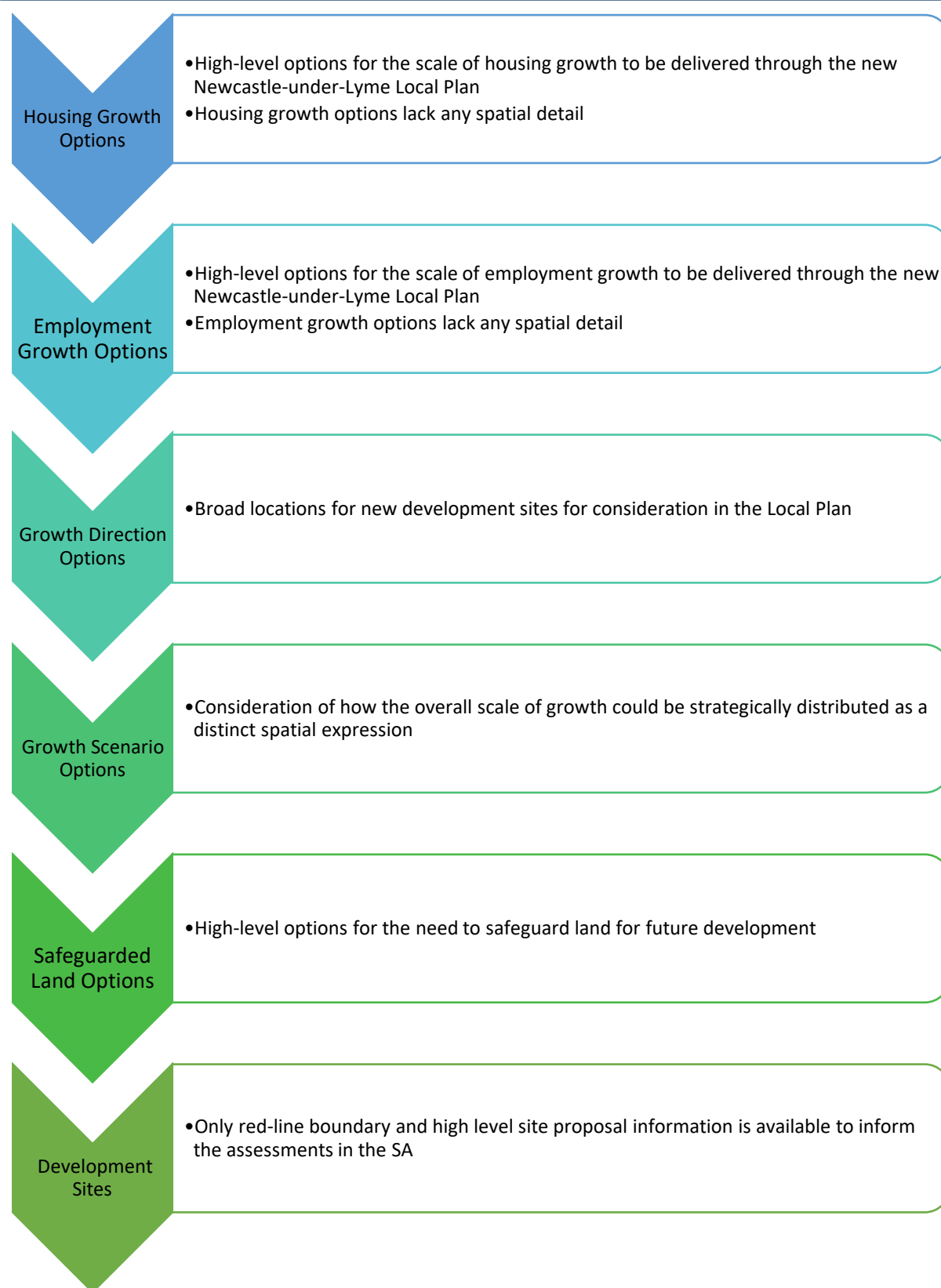


Figure 5.1: Definitions for the different types of reasonable alternatives assessed in the SA process

5.2.3 In addition to 23 draft policies, a range of reasonable alternatives were identified by the Council at the Regulation 18 stage and assessed within the Regulation 18 SA³²:

- Three housing growth options;
- Three employment growth options;
- Six growth direction options; and
- 141 reasonable alternative development sites.

5.2.4 At the Regulation 19 stage, a total of 55 draft policies were assessed, including 23 draft policy updates and 22 new policies (as well as 45 site allocation policies) have been assessed. Further reasonable alternatives have been identified since the Regulation 18 stage, and evaluated as part of this Regulation 19 SA Report:

- Three updated housing growth options;
- Three updated employment growth options;
- A new growth direction option;
- Four growth scenario options;
- Three safeguarded land options; and
- 36 new/amended reasonable alternative development sites.

5.2.5 **Figure 5.2** summarises the reasonable alternatives considered throughout the plan-making process, and at which chronological stage of the SA process these alternatives have been identified, described and evaluated.

³² Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volumes 1-3. May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 03/07/24]

Quick guide to reasonable alternatives

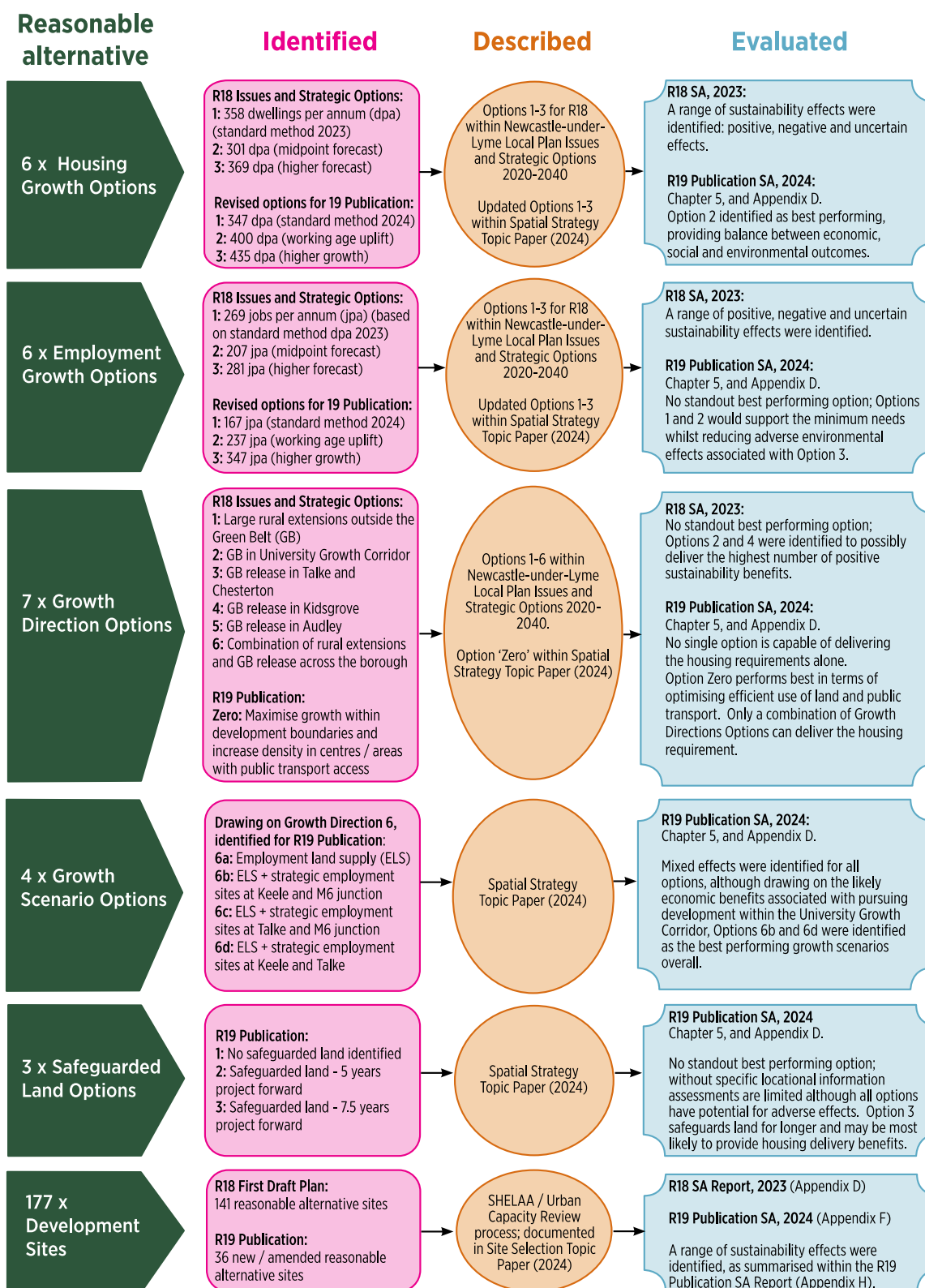


Figure 5.2: The identification, description and evaluation of reasonable alternatives considered throughout the plan-making process

5.3 Housing growth options

Appraisal of housing growth options at Regulation 18 (2023)

- 5.3.1 Three housing growth options were assessed within the Regulation 18 SA Report³³, based on the numbers derived from the Housing and Economic Needs Assessment (HEDNA) Update (2023)³⁴ for housing growth in the Newcastle-under-Lyme Borough for the Plan period. These three options related to variations on the standard method at the time of their evaluation, and modelled employment forecasts relating to population growth.
- 5.3.2 According to the HEDNA (2023), the housing need figure for Newcastle-under-Lyme was 358 homes per year. This meant that a total housing need of 7,160 homes was required to be met for the Plan period (2020 to 2040) at the time of assessment in 2023.
- 5.3.3 The three options for the quanta of housing growth identified by NuLBC at the Regulation 18 stage are presented in **Table 5.1**.

Table 5.1: Newcastle-under-Lyme housing growth options identified by NuLBC at the Regulation 18 stage (extracted from the R18 SA 2023)

Option	Dwellings per Annum	Total Dwelling Requirement 2020-2040
1. Standard Method	358	7,160
2. Midpoint of employment forecasts	301	6,020
3. Highest employment forecast	369	7,380

- 5.3.4 **Table 5.2** presents high-level summary assessment scores which seek to illustrate the sustainability performance of each housing growth option. Further details of the assessment results are presented in the Regulation 18 SA Report (2023)³⁵.

Table 5.2: Impact matrix of the three housing growth options for the Regulation 18 stage (extracted from the R18 SA 2023)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Housing Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	--	-	-	-	+/-	-	+/-	-	-	++	-	+
2	--	-	-	-	+/-	-	+/-	-	-	+	-	+
3	--	-	-	-	+/-	-	+/-	-	-	++	-	+

³³ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/24]

³⁴ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/5> [Date accessed: 03/07/24]

³⁵ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

5.3.5 Option 2 was identified as the best performing against the majority of SA Objectives, due to having the smallest housing number, and therefore likely placing the least pressure on the environment, including biodiversity and landscape receptors (SA Objectives 3 and 8) and soil and water resources (SA Objectives 4 and 6), amongst others. In contrast, Option 3 was identified as the best performing option against equality (SA Objective 10) as it exceeded the required housing need, potentially providing the greatest range in housing types of the three options. However, Option 3 was identified as the worst performing against all other environmental objectives relative to the other options, owing to the larger scale of growth proposed presenting further opportunities for adverse effects. Option 1 would provide a similar level of growth to Option 2.

5.3.6 At this stage of the assessment, the Council identified Option 1 to be taken forward as it has been informed by the local housing needs assessment, conducted using the standard method. The figure was considered to be aligned with economic jobs growth forecasts and represented the most deliverable option at the time, when balanced against site opportunities and constraints in the borough.

Appraisal of housing growth options at Regulation 19 (2024)

5.3.7 Following the information from a further HEDNA Update prepared in April 2024³⁶, three updated housing options were identified by NuLBC due to concern that the standard method figure will not provide enough homes to align with the latest employment growth forecasts for the Plan period. These three options meet or exceed the identified need, based on the latest standard method figure and modelled employment forecasts.

5.3.8 According to the updated HEDNA (2024), the current housing need figure for Newcastle-under-Lyme is 347 homes per year. This means that a total housing need of 6,940 homes was required to be met for the Plan period (2020 to 2040) at the time of assessment.

5.3.9 The three reasonable alternative options for the quanta of housing growth identified by NuLBC at this stage of the plan making process, following on from the three options considered at the Regulation 18 stage, are presented in **Table 5.3**.

Table 5.3: Newcastle-under-Lyme housing growth options identified by NuLBC at the Regulation 19 stage

Housing growth option	Dwellings per annum	Total dwelling requirement 2020-2040
1. Standard Method	347	6,940
2. Standard Method plus uplift for working age population	400	8,000
3. Higher growth option	435	8,700

5.3.10 **Table 5.4** presents high-level summary assessment scores which seek to illustrate the sustainability performance of each housing growth option. Further details of the assessment results are presented in the **Appendix D** of this report.

³⁶ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/> [Date accessed: 04/07/24]

Table 5.4: Impact matrix of the three additional housing growth options for the Regulation 19 stage

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Housing Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	--	-	-	-	+/-	-	+/-	-	-	+	-	+
2	--	-	-	-	+/-	-	+/-	-	-	++	-	+
3	--	-	-	-	+/-	-	+/-	-	-	++	-	+

5.3.11 In general, a larger number of proposed dwellings would be more likely to lead to adverse effects particularly on environmentally-focused SA Objectives. Option 1 proposes the smallest housing number and is likely to perform the best against environmental objectives, whereas Option 3 performs the best with regard to equality and housing provision (SA Objective 10) as it exceeds the housing need, but the development of this larger quantum of housing growth is likely to perform less well against the environmental objectives.

5.3.12 All three housing growth options propose a similar level of growth and perform similarly against the high-level SA scoring system, and all would satisfy the identified housing needs according to the standard method calculation. However, when factoring in the latest HEDNA information and the economic forecasts for the Plan area over the period 2020-2040, Options 2 and 3 emerge as the stronger choices.

5.3.13 Option 2 has been identified as the best performing overall, seeking to provide the best balance between economic, social and environmental outcomes, through ensuring housing growth aligns with the economic and employment growth forecasts in contrast to Option 1, but providing a lower quantum of growth than Option 3 and thus reducing environmental impacts.

Comment from Council: Option 2 has been taken forward as it has been informed by a Housing and Economic Needs Assessment. The figure is considered to be aligned with the economic jobs growth forecasts providing for an increase in the working age population. The option represents the most deliverable option when balanced against site opportunities and constraints in the Borough. Option 2 represents the best performing option in the SA in balancing economic, social and environmental outcomes through ensuring the housing option aligns and economic and employment forecasts.

5.4 Employment growth options

- 5.4.1 A total of three employment growth options were assessed within the Regulation 18 SA Report³⁷, based on the numbers derived from the HEDNA Update (2023)³⁸ for employment growth in the Newcastle-under-Lyme Borough for the Plan period. These three options related to different modelled employment forecasts based on variations on the standard housing method at the time of their evaluation.
- 5.4.2 According to the HEDNA Update (2023) the employment land supply at the time was 49.9ha. Additionally, the identified employment need figure estimation was between 36.5ha and 68.6ha of employment land to be met for the Plan period (2020 to 2040).
- 5.4.3 The three reasonable alternative options for the quanta of employment growth identified by NuLBC at the Regulation 18 stage of the plan making process are presented in **Table 5.5**.

Table 5.5: Newcastle-under-Lyme employment growth options identified by NuLBC at the Regulation 18 stage (extracted from the R18 SA 2023)

Option	Need	Supply (ha)	Job growth supported per annum
1. Standard Method	45.3 – 68.8ha	49.9ha	269 jobs
2. Midpoint of employment forecasts	40.7 – 68.8ha	49.9ha	207 jobs
3. Highest employment forecast	36.5 – 68.8ha	49.9ha	281 jobs

- 5.4.4 **Table 5.6** presents summary assessment scores which seek to illustrate the sustainability performance of each employment growth option. Further details of the assessment results are presented in the Regulation 18 SA Report (2023)³⁹.

Table 5.6: Impact matrix of the three employment growth options for the Regulation 18 stage (extracted from the R18 SA 2023)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Employment Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	-	-	-	-	+/-	-	+/-	-	0	+	-	++
2	-	-	-	-	+/-	-	+/-	-	0	+	-	++
3	-	-	-	-	+/-	-	+/-	-	0	+	-	++

³⁷ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/24]

³⁸ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/5> [Date accessed: 03/07/24]

³⁹ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

5.4.5 In the evaluation of employment growth options, there are a number of uncertain variables associated chiefly with size, nature and location which limit the ability of the SA to make firm conclusions with respect of several environmental variables. However, in terms of social and economic benefits, it was identified that Option 3 will be likely to perform the best with its ability to deliver the highest potential job growth of the three options.

5.4.6 At this stage of the assessment, the Council identified Option 1 to be taken forward as the level of jobs and economic growth was considered to align with the outcomes of the local housing need assessment conducted at the time using the standard method. It represented the most deliverable option to support economic growth but balanced against site opportunities and constraints within the borough.

Appraisal of employment growth options at Regulation 19 (2024)

5.4.7 Following the information from a further HEDNA Update prepared in April 2024⁴⁰, three updated employment growth options were identified by NuLBC due to concern that the standard method figure will not support a large enough working population to align with the latest employment growth forecasts for the Plan period. These three options meet or exceed the identified need based on the latest standard method figure and modelled employment forecasts.

5.4.8 According to the updated HEDNA (2024), the borough's employment land supply as of March 2023 has now reduced to 48ha. The updated scenarios presented within the HEDNA indicate a likely requirement for between 43 and 83ha of employment land for the Local Plan period to 2040.

5.4.9 The three reasonable alternative options for the quanta of employment growth identified by NuLBC at this stage of the plan making process, following on from the three options considered at the Regulation 18 stage, are presented in **Table 5.7**.

Table 5.7: Newcastle-under-Lyme employment growth options identified by NuLBC at the Regulation 19 stage

Employment growth option	Need	Supply (ha)	Job growth supported per annum
1. Standard Method	43ha	48ha	167 jobs
2. Standard Method plus uplift for working age population	63-83ha	48ha	237 jobs
3. Higher growth option	83ha	48ha	347 jobs

5.4.10 **Table 5.8** presents high-level summary assessment scores which seek to illustrate the sustainability performance of each employment growth option. Further details of the assessment results are presented in the **Appendix D** of this report.

⁴⁰ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/> [Date accessed: 04/07/24]

Table 5.8: Impact matrix of the three employment growth options for the Regulation 19 stage

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Employment Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	-	-	-	-	+/-	-	+/-	-	0	+	-	++
2	-	-	-	-	+/-	-	+/-	-	0	+	-	++
3	-	-	-	-	+/-	-	+/-	-	0	+	-	++

5.4.11 All three employment growth options are based on the same employment land supply figure of 48ha, based on the latest HEDNA evidence, but propose differing employment need figures ranging between 43ha and 83ha. The three options perform similarly against the high-level SA scoring system, and all will support the creation of at least 167 jobs per annum which equates to the job growth associated with the minimum actual need for 347 homes (based on the standard housing method calculation).

5.4.12 There are a number of uncertain variables associated chiefly with size, nature and location which limit the ability of the SA to make firm conclusions with respect of several environmental variables. However, in terms of social and economic benefits, it is likely that Option 3 will deliver the highest level of sustainability performance with its ability to deliver the highest potential job growth, although Option 2 indicates a range of employment need between 63 and 83ha so could lead to similar effects to Option 3 overall.

Comment from Council: Option 2 has been taken forward as it has been informed by a local needs assessment, conducted using the standard method. The figure is considered to be aligned with the economic job's growth forecasts providing for an increase in the working age population. The option represents the most deliverable option when balanced against site opportunities and constraints in the Borough.

5.5 Growth direction options

5.5.1 A total of seven growth direction options were identified by NuLBC and evaluated in the SA process. These seven options aim to relate the spatial strategy (as outlined in the Issues and Strategic Options document⁴¹) to the hierarchy of centres, and link to potential broad locations for strategic development sites around key locations in the borough.

5.5.2 Given the challenges in identifying sufficient land for significant growth within the development boundaries, the Council sought to explore the potential of land adjacent to existing settlements to be developed as an urban or rural extension, which would be likely to accommodate at least 1,000 dwellings. These expansions are reflected within the growth direction options.

⁴¹ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 01/06/24]

5.5.3 A total of six growth direction options have been evaluated in the Regulation 18 SA Report⁴². Following this, a further 'Growth Direction Option Zero' has been evaluated at the Regulation 19 stage. Growth Direction Option Zero was identified at the Issues and Options (2022)⁴³ stage as a source of land for development, and has now subsequently been incorporated into assessments to assist in understanding the evolution of the growth direction options. All seven options are presented in **Table 5.9** below.

Table 5.9: Newcastle-under-Lyme growth direction options identified by NuLBC (Options 1-6 extracted from the R18 SA 2023⁴⁴ and Option 0 within Appendix D)

Growth direction option	Local Plan stage	Description of growth direction option
Growth Direction 0	Regulation 19	Maximising development in development boundaries, including density uplift within town centres and at locations well served by public transport.
Growth Direction 1	Regulation 18	Development on strategic sites outside the Green Belt – Large rural extensions
Growth Direction 2	Regulation 18	Strategic Green Belt release for an urban extension – University Growth Corridor
Growth Direction 3	Regulation 18	Green Belt release for development of strategic sites – Talke and Chesterton expansion
Growth Direction 4	Regulation 18	Green Belt release for development of strategic sites – Kidsgrove expansion
Growth Direction 5	Regulation 18	Green Belt release for development of strategic sites – Audley Rural expansion
Growth Direction 6	Regulation 18	Combination of strategic sites across the borough comprising of both sites outside the Green Belt and sites which require Green Belt release

5.5.4 **Table 5.10** presents high-level summary assessment scores which seek to illustrate the sustainability performance of each growth direction option. Further details of the assessment results are presented in the Regulation 18 SA Report (2023)⁴⁵ and **Appendix D** of this report.

⁴² Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/24]

⁴³ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 01/06/24]

⁴⁴ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

⁴⁵ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

Table 5.10: Impact matrix of the six growth direction options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Growth Direction Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
0	-	-	-	+	+/-	-	-	-	+	+	+	+
1	--	--	-	--	-	-	-	+	-	-	-	-
2	+	+/-	-	-	0	-	-	--	+	+	+	+
3	-	-	+/-	+	0	-	-	--	+	+	+/-	+
4	-	+/-	-	+	0	-	-	--	+	+	+	+
5	--	-	-	-	-	-	-	--	-	-	-	-
6	-	-	-	+/-	+/-	-	+/-	-	-	+/-	+/-	+/-

5.5.5 The summary performance values in Table 5.10 show that Option 6 is associated with uncertainty owing to the distributed nature of the potential locations for growth direction. The option has the potential to perform well but lacks definition.

5.5.6 Options 2 or 4 may deliver a high number of positive sustainability benefits. Whilst these options would utilise undeveloped land, they provide easy access into Newcastle-under-Lyme Town with potential for existing public transport links with Keele University to be utilised. There is potential for employment opportunities associated with the University Growth Corridor and there are other nearby existing infrastructure and amenities which could be incorporated into or built upon by this option, including renewable energy schemes.

5.5.7 In respect to efficient use of land, access to local services and encouraging public transport, Growth Direction Option Zero is likely to perform better than Options 1-6 as a large proportion of development is likely to be located within existing development boundaries. However, uncertainty remains in regard to the capacity of services and infrastructure to deal with the expected growth and will not meet the needs alone, relying on Duty to Co-operate (DtC) contributions from neighbouring authorities.

5.5.8 It is also worth noting that development likely to result from Option Zero will have potential adverse effects across several SA Objectives, with an expected increase in greenhouse gas (GHG) emissions, reductions in air quality, loss of biodiversity, altering of the landscape character, changes to the setting of heritage assets and reduction in water quality (SA Objectives 1, 2, 3, 6, 7 and 8). The impact on flooding (SA Objective 5) in the area is uncertain, owing to the unknown site-specific location. However, the development expected will be located within development boundaries and therefore adverse effects will likely be smaller in scale in comparison to Options 1-6.

Comment from Council: Option 6 (hybrid approach) has been progressed as it represents a balanced approach that seeks to support development in the strategic and urban centres whilst supporting a smaller scale of development in the rural areas to support sustainable patterns of development across the borough. Option 6 also reflects the outcomes of Option Zero as a 'starting point' i.e. it has sought to maximise brownfield land opportunities / land within development boundaries first before looking at site options outside of existing development boundaries.

5.6 Growth scenario options

5.6.1 Following the seven growth direction options identified by the Council, NuLBC have identified four 'growth scenarios'. These underpin Growth Direction Option 6, which was selected by the Council at the Regulation 18 stage, and are intended to provide further clarity on the spatial definition provided by Option 6 given the uncertainty identified in the SA assessment (as shown in **Table 5.10** above).

5.6.2 These four growth scenario options as set out in **Table 5.11** were identified by NuLBC to explore further alternatives based around new proposed employment allocations including strategic employment sites.

Table 5.11: Newcastle-under-Lyme growth scenario options identified by NuLBC

Growth scenario option	Employment land supply	Strategic employment sites	Gross employment land supply
Growth Scenario 6a	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> No strategic sites. 	69.6ha
Growth Scenario 6b	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) KL15 Land South of A525 between Keele University and Newcastle (13ha) 	104.6ha
Growth Scenario 6c	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) TK30 Land off Talke Road and A500, Talke (51ha) 	142.6ha
Growth Scenario 6d	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> KL15 Land South of A525 between Keele University and Newcastle (13ha) TK30 Land off Talke Road and A500, Talke (51ha) 	133.6ha

5.6.3 **Table 5.12** presents high-level summary assessment scores which seek to illustrate the sustainability performance of each growth scenario option. Further details of the assessment results are presented in the **Appendix D** of this report.

Table 5.12: *Impact matrix of the four growth scenario options*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Growth Scenario Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
6a	0	-	-	-	-	0	-	-	0	+	0	+
6b	-	-	-	-	-	-	-	-	0	++	-	++
6c	-	-	-	-	-	-	-	-	0	+	-	++
6d	-	-	-	-	-	0	-	-	0	++	-	++

5.6.4 All options will support the creation of employment opportunities, therefore scoring positively against SA Objectives 10 (equality) and 12 (economy). When compared to the other options, Option 6a performs slightly worse with regard to the creation of employment opportunities (SA Objective 12), falling slightly short of the 83ha of employment land requirement identified within the latest HEDNA. Options 6b and 6d will provide additional benefits in regard to employment opportunities owing to the higher level of growth, including within the University of Keele Growth Corridor, and are therefore identified as better performing options than 6a and 6c under SA Objective 10 (equality).

5.6.5 The large quantum of growth proposed under all four options will have potential adverse effects across several SA Objectives, owing to loss of previously undeveloped land with implications for ecological networks and landscape settings, reduction in air quality associated with new growth, possible exacerbation of flood risk, and changes to the setting of heritage assets (SA Objectives 2, 3, 4, 5, 7 and 8). The development under Options 6b and 6d is likely to have greater potential for adverse effects on water quality (SA Objective 6), owing to the location of the proposed development within groundwater source protection zone (SPZ) 3, although it is acknowledged that all options may give rise to increased risks of water pollution in general.

5.6.6 Although Option 6c has the potential to deliver the highest quantum of employment floorspace, Options 6b and 6d will support development within the University of Keele Growth Corridor, with associated benefits for employment skills and training opportunities. As such, Options 6b and 6d were identified as the best performing overall.

Comment from Council: Growth Scenario 6b has been taken forward as it supports the anticipated level of employment / jobs growth in the borough. The Strategic Employment Sites Study considers that there is a case for the allocation of sites AB2 and KL15 in the Local Plan. Option 6(b) is one of two options (along option 6(c)) which performs best through the SA.

5.7 Safeguarded land options

5.7.1 A total of three safeguarded land options have been identified by NuLBC, following the publication of Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1 (2017)⁴⁶, Part 2 (2020)⁴⁷, Part 3 (2023)⁴⁸, and subsequently Part 4 (2024)⁴⁹. Part 3 of the Green Belt Assessment included advice on safeguarded land, exploring whether it is necessary and how to determine its the quantum and location. This advice has been used by NuLBC to identify three safeguarded land options as presented in **Table 5.13**.

5.7.2 The location of new development under the 'no safeguarded land' scenario within Option 1 is unknown, and to some extent so is the location of development under Options 2 and 3, although it is expected that safeguarded land under Options 2 and 3 will be located in accordance with the requirements within the NPPF (paragraph 148)⁵⁰ where it states that when defining Green Belt boundaries plans should *"where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet long-term development needs stretching well beyond the plan period"*.

Table 5.13: Newcastle-under-Lyme safeguarded land options identified by NuLBC

Safeguarded land option	Associated housing growth	Additional information
1. Safeguarded Land – None identified	0	This option is not to identify safeguarded land. This option is informed by factors suggesting it may not be necessary to identify safeguarded land.
2. Safeguarded Land – 5 years project forward	1,561.5 – 1,800 dwellings	<ul style="list-style-type: none"> Projecting forward 5 years of development requirement (for housing only) The range represents the standard method calculation outcome of 347 (lower) and then the 400 housing requirement figure (higher) The range also includes a reduction of 10% as outlined in the attached report
3. Safeguarded Land – 7.5 years project forward	2342.25 – 2,700	<ul style="list-style-type: none"> Projecting forward 7.5 years of development requirement The range represents the standard method calculation outcome of 347 (lower) and then the 400 housing requirement figure (higher) The range also includes a reduction of 10% as outlined in the attached report

5.7.3 **Table 5.13** presents summary assessment scores which seek to illustrate the sustainability performance of each safeguarded land option. Further details of the assessment results are presented in the **Appendix D** of this report.

⁴⁶ Arup (2017) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1, November 2017. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

⁴⁷ Arup (2020) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 2, December 2020. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

⁴⁸ Arup (2023) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 3, June 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

⁴⁹ Arup (2024) Newcastle-under-Lyme and Stoke-on-Trent Draft Green Belt Assessment Part 4, May 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

⁵⁰ DLUHC (2023) National Planning Policy Framework, December 2023. Paragraph 148. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 23/07/24]

Table 5.3: Impact matrix of the three safeguarded land options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Safeguarded Land Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	--	+/-	-	+/-	+/-
2	-	-	-	-	+/-	-	+/-	-	-	+	-	-
3	-	-	-	-	+/-	-	+/-	-	-	+	-	-

5.7.4 Options 2 and 3 perform similarly against the high-level SA scoring system. Both will increase the future housing land supply which is expected to provide a greater mix of housing types including affordable housing, with Option 3 likely performing better overall given it would safeguard land for a longer period of time. However, Options 2 and 3 are likely to result in adverse effects on environmental objectives to some extent, owing to the loss of undeveloped land. All three options are identified to result in adverse effects on the surrounding landscape owing to the undeveloped, rural nature of the development, although Option 1 is more likely to give rise to significant adverse effects on the landscape when compared to Options 2 and 3, owing to the higher probability of Green Belt release under Option 1.

5.7.5 There is greater uncertainty with regard to the location and nature of development included within Option 1 and this has resulted in uncertain impacts being identified across the majority of SA Objectives. Without safeguarding land, there is less certainty regarding the future development pattern, and there will potentially be higher reliance on windfall developments, and increased pressure for development in less sustainable locations further from existing centres.

5.7.6 Further assessment will be needed to provide clarity in this evaluation as the relative sustainability performance will depend on the specific location of the land to be safeguarded under Options 2 and 3, which is unknown at present.

Comment from Council: Option 1 has been taken forward for the following reasons:-

- There is significant uncertainty at a national level which presents difficulties in robustly establishing housing and employment needs beyond the end of the plan period
- In accordance with national policy, there needs to be a robust exceptional circumstances case to amend the Green Belt to provide for safeguarded land. Given the significant uncertainty in establishing housing and employment needs beyond the end of the plan period, the council considers that there is not an exceptional circumstances case.
- The local plan proposes a degree of flexibility. It is considered that this flexibility in housing supply will contribute to needs beyond the end of the plan period.
- The proposed spatial strategy for employment includes a supply which will contribute to needs beyond the end of the plan period. Therefore, there is no need to safeguarded land for employment.
- In relation to housing site options there are insufficient available Green Belt options to 'safeguard' to provide 5 – 10 years housing land supply beyond the plan period.
- Reforms are anticipated to the planning system including in relation to plan making which may require an early review of the local plan. On this basis the spatial strategy may need

to be reviewed in the short term in a different legislative context. Therefore, the requirement for safeguarded land is uncertain.

5.8 Reasonable alternative sites

5.8.1 The identification, description and evaluation of development sites has taken place throughout the plan making process at different stages. A total of 177 reasonable alternative sites have been considered throughout the SA process, as follows:

- The Regulation 18 SA Report (2023)⁵¹ included an assessment of 141 reasonable alternative sites identified by the Council comprising:
 - 106 sites to be considered for residential use;
 - Five sites to be considered for employment use;
 - 22 sites to be considered for mixed uses (residential and employment);
 - One site where the potential use is uncertain (either residential or employment); and
 - Seven sites to be considered for Gypsy and Traveller use.
- This Regulation 19 SA Report includes an assessment of 36 reasonable alternative sites in **Appendix F**, as summarised below:
 - 27 new sites including 22 for residential use, one site for employment use, and four sites Gypsy and Traveller use; and
 - Nine amended sites including seven residential sites, one employment site and one mixed-use site. This includes SP11 which has been split into four separate sites (SP11(1), SP11(2), SP11(3) and SP11(4)).

5.8.2 All reasonable alternative development sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of 'green wash'; a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance 2018⁵²) of presenting assessment results before and after mitigation has been applied.

5.8.3 A range of positive and negative adverse effects on sustainable development arising from the reasonable alternative sites were identified in the SA process. Potential adverse effects identified within the pre-mitigation process have been summarised in **Table 5.14** below.

⁵¹ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

⁵² RTPI (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/> [Date accessed: 03/07/24]

Table 5.14: Summary of positive and negative effects identified within the pre-mitigation site assessments

Positive effects	Negative effects
<ul style="list-style-type: none"> • Provision of new housing • Provision of employment floorspace to provide jobs • Potential for drawing energy from low and zero carbon (LCZ) technologies • Improvements to waste management and recycling • Proximity to public greenspaces and the Public Right of Way (PRoW) network • Majority of sites coincide with Flood Zone 1 where fluvial flood risk is low • Proximity to bus stops 	<ul style="list-style-type: none"> • Exposure to poor air quality due to proximity to main roads • Increase of greenhouse gas emissions • Impacts on nature conservation sites and ecological networks • Loss of previously undeveloped land and best and most versatile (BMV) soil • Coinciding with mineral safeguarding areas (MSAs) • Coinciding with areas of surface water flood risk (SWFR) • Being located within areas of 'medium' or 'high' landscape sensitivity • Increase of urban sprawl including within the Green Belt • Altering views on the landscape, historic environment and from the PRoW network • Locating site end users away from healthcare facilities, schools, shops and transport services • Depletion of water quality and lowered capacity for wastewater management

5.8.4 All reasonable alternative sites have been assessed in terms of potential impacts on each SA Objective, the results of which are presented in Appendix D of the Regulation 18 Report⁵³, and **Appendix H** of this report. Scores should be read in conjunction with the detailed text narrative provided for each site in the relevant SA report.

5.8.5 Mitigation, using the draft Local Plan policies, has been applied to the SA results for each reasonable alternative site and presented in **Table H.4.1** within **Appendix H**.

5.8.6 Following consideration of the SA findings, as well as other evidence-based studies such as viability assessments, the Council have selected 54 preferred development sites for allocation in the Local Plan (as discussed further in **Chapter 6**). **Appendix I** sets out the outline reasons for selection and rejection of all reasonable alternative sites considered throughout the SA process, provided by NuLBC.

⁵³ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 09/02/24]

5.9 Draft Local Plan policies

- 5.9.1 A proposed Vision, Strategic Objectives and 55 draft strategic and non-strategic policies have been assessed in the SA, including 23 of these policies which were assessed in draft form at the Regulation 18 stage.
- 5.9.2 The majority of strategic and non-strategic policies set out the requirements for development and seek to protect the natural and built environment and ensure there is sufficient community infrastructure to support new residents. As these policies largely seek to protect existing assets or enhance the provision of these features, the policy assessments largely identified minor positive or negligible impacts.
- 5.9.3 Positive impacts were identified across a number of assessed policies, particularly in relation to socially centred objectives, including health and wellbeing, equality, and transport and accessibility. Where negative impacts were identified, these were predominately on climate change, air, natural resources, and waste.
- 5.9.4 SA of the policies enables scrutiny of how effective the policies are as mitigation tools. **Appendix G** presents appraisal results for the policies proposed in the Local Plan.
- 5.9.5 In addition, 45 site policies for selected sites were assessed in **Appendix J**. The assessment of site policies has drawn on the findings from the post-mitigation evaluation of reasonable alternative sites (see **Appendix H**), but also takes into account the further site-specific information and mitigation proposed through the site policies for the 45 sites which have been selected for allocation.

6 The preferred approach

6.1 Local Plan policies

6.1.1 Following consideration of comments received during the Regulation 18 consultation and recommendations set out in the SA reports, NuLBC has revised the Local Plan policies. The Local Plan contains the Vision, Strategic Objectives and a total of 55 policies, including 25 strategic policies and 30 non-strategic policies. These 55 policies, alongside the vision and strategic objectives, have been assessed in **Appendix G**.

6.1.2 The proposed Local Plan policies are listed in **Table 6.1**.

Table 6.1: Newcastle-under-Lyme Local Plan policies

Policy Ref.	Policy name	Type of policy
	Planning for Sustainable Development	
PSD1	Overall Development Strategy	Strategic
PSD2	Settlement Hierarchy	Strategic
PSD3	Distribution of Development	Strategic
PSD4	Development Boundaries and the Open Countryside	Strategic
PSD5	Green Belt	Strategic
PSD6	Health and Wellbeing	Strategic
PSD7	Design	Strategic
	Climate and Renewable Energy	
CRE1	Climate Change	Strategic
CRE2	Renewable energy	Strategic
	Housing	
HOU1	Affordable Housing	Strategic
HOU2	Housing Mix and Density	Strategic
HOU3	Housing Standards	Strategic
HOU4	Gypsy, Travellers and Travelling Showpeople	Non-strategic
HOU5	Specialist Needs Housing	Non-strategic
HOU6	Self Build and Custom Dwellings	Non-strategic
HOU7	Houses of Multiple Occupation	Non-strategic
HOU8	Rural and First Homes Exception Sites	Non-strategic
HOU9	Community Led Exception Sites	Non-strategic
HOU10	Extensions, Alterations and Relationships between Dwellings	Non-strategic
HOU11	Backland Development	Non-strategic
	Employment	
EMP1	Employment	Strategic
EMP2	Existing Employment Sites	Non-strategic
EMP3	Tourism	Non-strategic
	Retail	
RET1	Retail	Strategic
RET2	Shop Fronts, Advertisements, New Signage	Non-strategic
RET3	Restaurants, Cafes, Pubs and Hot Food Takeaways	Non-strategic

Policy Ref.	Policy name	Type of policy
RET4	Newcastle-under-Lyme Town Centre	Non-strategic
RET5	Kidsgrove Town Centre	Non-strategic
	Infrastructure and Transport	
IN1	Infrastructure	Strategic
IN2	Transport and Accessibility	Strategic
IN3	Access and Parking	Non-strategic
IN4	Cycleways, Bridleways and Public Rights of Way	Non-strategic
IN5	Provision of Community Facilities	Non-strategic
IN6	Telecommunications Development	Non-strategic
IN7	Utilities	Strategic
	Sustainable Environment	
SE1	Pollution and Air Quality	Strategic
SE2	Land Contamination	Non-strategic
SE3	Flood Risk Management	Strategic
SE4	Sustainable Drainage Systems	Non-strategic
SE5	Water Resources and Water Quality	Strategic
SE6	Open Space, Sports and Leisure Provision	Strategic
SE7	Biodiversity Net Gain	Strategic
SE8	Biodiversity and Geodiversity	Strategic
SE9	Historic Environment	Strategic
SE10	Landscape	Non-strategic
SE11	Trees, Hedgerows and Woodland	Non-strategic
SE12	Amenity	Non-strategic
SE13	Soil and Agricultural Land	Non-strategic
SE14	Green and Blue Infrastructure	Non-strategic
	Rural Matters	
RUR1	Rural Economy	Non-strategic
RUR2	Rural Workers Dwellings	Non-strategic
RUR3	Extensions and Alterations to Buildings Outside of Settlement Boundaries	Non-strategic
RUR4	Replacement Buildings Outside of Settlement Boundaries	Non-strategic
RUR5	Re-use of Rural Buildings for Residential Use	Non-strategic
	Site Allocations	
SA1	General Requirements (Site Allocations)	Strategic

6.1.3 The impact matrices for the policy assessments including the vision and strategic objectives are presented in **Table 6.2** below.

Table 6.2: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
Vision	+/-	+/-	+	+	+	+	+	++	+	++	+/-	++
Objectives	++	+	+	+	+	+	+	++	++	++	++	++
PSD1	--	-	-	-	+/-	-	+/-	+/-	-	++	+/-	++
PSD2	+	-	-	-	-	-	-	-	+	++	+	++
PSD3	+	-	-	-	-	-	-	-	+	++	+	++
PSD4	0	0	0	+	0	0	0	+	0	+	0	+
PSD5	+/-	+/-	0	-	+/-	+/-	+/-	-	0	+	0	+
PSD6	+	0	0	0	0	0	0	0	++	++	+	0
PSD7	+	+	+	+	+	+	+	++	+	++	+	0
CRE1	++	+	+	++	+	+	+	+	+	+	+	0
CRE2	++	+	0	+	0	0	0	0	0	0	0	0
HOU1	0	0	0	0	0	0	0	+	+	++	0	0
HOU2	0	0	0	0	0	0	0	0	+	++	0	0
HOU3	0	0	0	0	0	0	0	0	+	+	0	0
HOU4	0	-	0	-	0	-	0	0	-	+	+	0
HOU5	0	0	0	0	0	0	0	0	+	+	0	0
HOU6	+	0	0	+	0	0	0	0	0	+	0	0
HOU7	0	0	0	0	0	0	0	0	+	+	+	0
HOU8	0	0	0	+/-	0	0	0	0	+	+	0	+
HOU9	0	0	0	+/-	0	0	0	0	0	+	0	0
HOU10	0	0	0	0	0	0	0	+	0	+	0	0
HOU11	0	0	0	0	0	0	0	+	0	0	0	0
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++
EMP2	0	0	0	+	0	0	0	0	0	0	0	+
EMP3	0	0	0	+	0	0	+	0	0	0	+	+
RET1	0	0	0	0	0	0	0	+	+	+	+	++
RET2	0	0	0	0	0	0	+	+	0	0	0	0
RET3	0	0	0	0	0	0	0	0	+	0	0	0
RET4	+	-	0	+	0	0	-	+	0	+	+	+
RET5	+	+	+	0	+	0	0	+	+	0	++	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN1	+	0	+	+	+	+	+	0	+	+	+	0
IN2	+	+	0	0	0	+	0	+	+	+	++	+
IN3	+	+	0	0	0	0	0	0	+	0	+	0
IN4	0	0	0	0	0	0	0	0	+	0	+	0
IN5	0	0	0	+	0	0	0	0	0	+	0	0
IN6	+	+	0	0	0	0	0	0	0	0	0	+
IN7	+	0	+	0	+	+	0	0	+	0	0	0
SE1	+	+	+	0	0	+	0	+	+	+	+	0
SE2	0	0	+	+	0	+	0	0	+	0	0	0
SE3	+	0	0	0	++	+	0	0	0	0	0	0
SE4	+	0	+	0	+	+	0	0	0	0	0	0
SE5	0	0	+	0	0	+	0	0	+	0	0	0
SE6	0	0	+	0	0	0	0	+	++	+	0	0
SE7	+	+	++	0	+	0	0	0	+	0	0	0
SE8	+	+	++	+	+	+	0	0	+	0	0	0
SE9	0	0	0	0	0	0	++	+	0	0	0	+
SE10	+	0	+	0	+	+	+	++	+	0	0	0
SE11	+	+	++	+	+	+	0	+	+	0	0	0
SE12	0	0	0	0	0	0	0	+	+	0	0	0
SE13	+	0	0	++	0	0	0	0	0	0	0	+
SE14	+	+	++	+	++	+	0	+	+	0	+	0
RUR1	0	0	0	+	0	0	+	+	+	0	0	++
RUR2	0	0	0	+/-	0	0	+	+	0	+	0	+
RUR3	0	0	0	+/-	0	0	+	+	0	0	0	0
RUR4	0	0	0	+/-	0	0	+	+	0	0	0	0
RUR5	0	0	0	+	0	0	+	+	0	0	0	0
SA1	+	+	++	+	++	++	+	+	+	++	+	0

6.2 Assessment of site allocations

6.2.1 Following the assessment of reasonable alternatives in the SA and consideration of other evidence-based documents, NuLBC has selected a total of 54 development sites for allocation including:

- 40 sites for residential use;
- Four sites for employment use;
- Two sites for Gypsy, Traveller and Travelling Showpeople use; and
- Eight mixed use sites.

6.2.2 The post-mitigation SA findings for the sites chosen for allocation by NuLBC are summarised in **Table 6.2**, illustrating a range of identified sustainability effects identified through the assessment process.

6.2.3 The full post-mitigation findings for all reasonable alternative sites considered throughout the SA process, including these sites that have been selected, are set out in **Appendix H**.

Table 6.2: Summary of post-mitigation site assessments for allocated sites

Site ref	SA stage	SA1 Climate Change	SA2 Air	SA3 Biodiversity, Flora & Fauna	SA4 Natural Resources & Waste	SA5 Flooding	SA6 Water	SA7 Cultural Heritage	SA8 Landscape	SA9 Health & Wellbeing	SA10 Equality	SA11 Transport & Accessibility	SA12 Economy
AB2	R19	+	-	-	--	0	0	0	--	-	++	-	++
AB12	R18	0	0	+/-	-	+	0	0	--	-	++	-	0
AB15	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
AB33	R18	0	0	+/-	-	+	0	0	--	-	+	-	0
SB12	R18	+/-	-	-	++	+	0	0	+	-	+	-	0
CT1	R19	+	-	+/-	++	+	0	0	-	-	++	-	0
CT20	R18	+/-	0	--	++	+	0	0	-	-	0	-	+
CH3	R18	0	0	+/-	++	+	0	0	-	-	++	-	0
CH13	R18	+/-	0	+/-	+	0	0	0	+	-	0	-	0
CH14	R18	0	0	+/-	+	+	0	0	+	-	+	-	0
KS3	R18	0	0	+/-	+	+	0	0	+	-	++	-	0
KS11	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
KS17	R18	0	0	+/-	+	+	0	0	+	-	+	-	0
KS18	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
KS19	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
WS9	R19	0	-	-	++	+	0	0	+	-	+	-	0
KL13	R18	+	-	--	--	+	0	0	--	-	++	-	0
KL15	R18	+	-	+/-	-	+	0	0	--	-	++	-	++
KG6	R18	+/-	-	+/-	+	+	0	0	+	-	+	++	0
RC8	R18	+/-	-	--	+	+	0	0	+	-	+	++	0
LW53	R18	+/-	0	+/-	-	+	0	0	--	-	++	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
LW87	R18	+/-	-	+/-	+	+	0	0	--	-	+	-	0
MD29	R19	+/-	-	+/-	-	+	0	0	-	-	++	-	0
LW74	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
NC13	R18	+	0	-	++	+	0	0	-	-	+	-	0
SP2	R18	+/-	0	+/-	++	+	0	0	+	-	++	-	0
SP11(1)	R19	+	-	-	-	+	0	0	--	-	++	-	0
SP11(2)	R19	+	-	--	-	+	0	0	--	-	++	-	0
SP11(3)	R19	+	0	+/-	-	+	0	0	--	-	++	-	0
SP11(4)	R19	+	0	-	-	+	0	0	--	-	++	-	0
SP22	R18	+/-	0	+/-	++	+	0	0	+	-	++	-	0
SP23	R19	+	-	--	-	+	0	0	--	-	++	-	0
BW1	R19	+	-	-	++	+	0	0	-	-	++	-	+
BL8	R18	+/-	0	+/-	+	+	0	0	+	-	++	-	+
BL18	R19	0	-	-	+	+	0	0	-	-	0	++	0
BL32	R18	+/-	-	-	+	+	0	0	+	-	+	++	+
TK6	R18	0	0	+/-	+	+	0	0	-	-	++	-	0
TK10	R18	+	0	-	-	+	0	0	--	-	+	-	0
TK17	R18	+	-	-	++	+	0	0	-	-	++	-	0
TK27	R18	+	0	-	-	+	0	0	-	-	+	-	0
TB6	R18	+/-	-	+/-	-	+	0	0	+	-	++	-	0
TB19	R18	+	-	-	--	+	0	0	--	-	++	-	++
TB23	R18	+/-	-	-	-	0	0	0	+	-	+	-	0
TC7	R18	0	-	+/-	++	+	0	0	+	++	+	-	+
TC19	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC20	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC22	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	+
TC40	R18	+/-	-	+/-	++	+	0	0	+	++	0	-	0
TC45	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC50	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC52	R19	+/-	-	+/-	++	+	0	0	+	++	++	-	0
TC71	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
Site 8	R19	+/-	0	+/-	-	+	0	0	+	-	+	-	0
Site 11	R19	+/-	-	+/-	+	0	0	0	+	-	++	++	0

6.3 Site allocation policies

6.3.1 NuLBC has identified a wide range of locations to contribute towards the delivery of approximately 8,000 new homes within the Local Plan, which will exceed the identified minimum housing requirement as per the standard methodology of 6,940 homes across the Plan period, or 347 homes per annum. The delivery of 8,000 homes, or 400 dwellings per annum, will allow enough homes to be delivered to support economic growth ambitions and infrastructure investment, as evidenced within the HEDNA (2024)⁵⁴ and discussed within **Chapter 5**.

6.3.2 A total of 45 site allocation policies have been prepared by NuLBC and assessed in the SA which relate to proposed development sites which have also been assessed as part of the reasonable alternative site assessments. The assessment of site policies has drawn on the findings from the post-mitigation evaluation of reasonable alternative sites as outlined in **Table 6.2** with the full assessments in **Appendix H**. These assessments also take into account the further site-specific information and mitigation proposed through the site policies for the 45 sites which have been selected for allocation, which was not factored into the reasonable alternative site assessments.

6.3.3 The impact matrices for all site policy assessments are presented in **Table 6.3** below. More detailed narrative on the site policy assessments can be found in **Appendix J**.

Table 6.3: Summary of site policy assessments

Policy reference	SA1 Climate Change	SA2 Air	SA3 Biodiversity, Flora & Fauna	SA4 Natural Resources & Waste	SA5 Flooding	SA6 Water	SA7 Cultural Heritage	SA8 Landscape	SA9 Health & Wellbeing	SA10 Equality	SA11 Transport & Accessibility	SA12 Economy
AB2	0	-	0	-	0	0	0	-	-	0	0	++
AB12	0	0	0	0	+	0	0	-	-	++	-	0
AB15	+/-	0	0	0	+	0	0	-	-	+	-	0
AB33	0	0	0	0	+	0	0	-	-	+	-	0
BW1	+	-	-	++	+	0	0	-	-	++	-	+
CT1	+	-	0	++	+	0	0	-	-	++	+	0
CH13	+/-	0	0	+	0	0	0	+	0	0	0	0
CH14	0	0	0	+	+	0	0	+	0	+	0	0
CT20	+/-	0	--	++	+	0	0	-	-	0	+	+
KL13	+	-	-	-	+	0	0	-	-	++	0	0
KL15	+	-	0	-	+	0	0	-	-	++	-	++
KG6	+/-	-	+	+	+	0	0	+	-	+	++	0
G&T11	+/-	-	+	+	0	0	0	+	-	+	++	0
KS3	0	0	0	+	+	0	0	+	0	++	0	0

⁵⁴ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/> [Date accessed 04/07/24]

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS11	+/-	0	+	+	+	0	0	+	0	+	0	0
KS17	0	0	0	+	+	0	0	+	0	+	0	0
KS18	+/-	0	+	+	+	0	0	+	0	+	0	0
KS19	+/-	0	+	+	+	0	0	+	-	+	-	0
LW53	+/-	0	0	-	+	0	0	+	-	++	-	0
MD29	+/-	-	0	-	+	0	0	-	-	++	0	0
NC13	+	0	-	++	+	0	0	-	-	+	-	0
SP2	+/-	0	0	++	+	0	0	+	-	++	-	0
SP11 (1, 2, 3, 4)	+	-	0	-	+	0	0	-	0	++	+	0
SP22	+/-	0	0	++	+	0	0	+	0	++	-	0
SP23	+	-	--	-	+	0	0	-	-	++	0	0
G&T8	+/-	-	0	+	0	0	0	+	-	++	++	0
BL8	+/-	0	0	+	+	0	0	+	0	++	0	+
BL18	0	-	0	+	+	0	0	-	-	0	++	0
BL32	+/-	-	-	+	+	0	0	+	-	+	++	+
TK6	0	0	0	+	+	0	0	-	-	++	0	0
TK10	+	0	-	-	+	0	0	-	-	+	0	0
TK17	+	-	-	++	+	0	0	-	-	++	0	0
TK27	+	0	-	-	+	0	0	-	-	++	0	0
TB6	+/-	-	+	-	+	0	0	+	0	++	0	0
TB19	+	-	0	--	+	+	0	-	-	++	-	++
TB23	+/-	-	-	-	0	0	0	+	-	+	0	0
TC7	0	-	0	++	+	0	0	+	++	+	0	+
TC19	+/-	-	0	++	+	0	0	+	++	+	0	0
TC20	+/-	-	+	++	+	0	0	+	++	+	0	0
TC22	+/-	-	0	++	+	0	0	+	++	+	0	+
TC40	+/-	-	0	++	+	0	0	+	++	0	0	0
TC45	+/-	-	0	++	+	0	0	+	++	+	0	0
TC50	+/-	-	+	++	+	0	0	+	++	+	-	0
TC52	+/-	-	0	++	+	0	0	+	++	++	0	0
TC71	+/-	-	0	++	+	0	0	+	++	+	0	0

6.4 Whole plan appraisal

6.4.1 The following chapters present an assessment of the likely significant effects associated with the NuLBC Local Plan in relation to the following topics:

- Air (**Chapter 7**);
- Biodiversity, flora and fauna (**Chapter 8**);
- Climatic factors (**Chapter 9**);
- Cultural heritage (**Chapter 10**);
- Human health (**Chapter 11**);
- Landscape (**Chapter 12**);
- Population and material assets (**Chapter 13**);
- Soil (**Chapter 14**); and
- Water (**Chapter 15**).

6.4.2 Each of the topic sections are presented in terms of baseline, impacts, mitigation and residual effects, where appropriate. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of policies and site allocations (see **Volume 3: Appendices** for the full assessments). The assessments include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise.

7 Air

7.1 Baseline

7.1.1 Poor air quality is directly linked to mortality, such as through heart disease, lung disease and various cancers. Particulate matter is predominantly associated with vehicular emissions, although agriculture, combustion from domestic heating and the construction industry are also significant sources. The fraction of mortality thought to be attributable to particulate air pollution is slightly less in Newcastle-under-Lyme Borough than it is for the West Midlands and England as a whole (see **Table 7.1**).

Table 7.1: Fraction of mortality attributable to particulate air pollution (data from 2021)⁵⁵

Region	Fraction of mortality attributable to particulate air pollution
Newcastle-under-Lyme	5.0%
West Midlands	5.5%
England	5.5%

7.1.2 Poor air quality, and in particular excess atmospheric nitrogen deposition, can also have a variety of impacts on the natural environment which often result in losses in biodiversity, resulting from eutrophication, acidification and toxicity^{56,57}.

7.1.3 At the time of carrying out the SA assessments at the Regulation 18 stage, four Air Quality Management Areas (AQMAs) were identified in Newcastle-under-Lyme, predominantly associated with busy roads including the A519, A525, B5370, B5369, and Liverpool Road (see **Figure 7.1**). These AQMAs⁵⁸ are:

- AQMA No.1 – Kidsgrove
- AQMA No.2 – Newcastle-under-Lyme Town
- AQMA No.3 – Maybank, Wolstanton, Porthill
- AQMA No.4 – Little Madeley

7.1.4 Adjacent to Newcastle-under-Lyme is the Stoke-on-Trent AQMA that borders the borough on the eastern boundary. The Stoke-on-Trent AQMA encompasses the city of Stoke-on-Trent and was declared in 2006 and amended in 2011.

⁵⁵ Office for Health Improvement and Disparities (2023) Public Health Profiles: Fraction of mortality attributable to particulate air pollution (new method). Available at: <https://fingertips.phe.org.uk/search/air%20pollution#page/4/gid/1/pat/15/par/E92000001/ati/401/are/E07000195/iid/93861/age/230/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1/page-options/tre-do-1> [Date accessed: 22/01/24]

⁵⁶ Sala, O. E. *et al.* (2000) Global biodiversity scenarios for the year 2100. *Science*. 287:1770-1774

⁵⁷ Air Pollution Information System (2016) Nitrogen Oxides (NOx). Available at: http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm [Date accessed: 03/07/24]

⁵⁸ DEFRA (2024). UK Air Information Resource. Local Authority Details. Newcastle-under-Lyme. Available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=170 [Date accessed: 22/01/24]

- 7.1.5 AQMA No.4 Little Madeley has recently been approved for revocation by the Public Protection and Licensing Committee in September 2023⁵⁹.
- 7.1.6 Actions in the Council's 2019-2024 Air Quality Action Plan⁶⁰ for improving air quality in each AQMA are generally centred around reducing congestion. Air quality in the borough is improving, evident in the approval of revoking AQMA 'No.4 Little Madeley' that has been compliant for the previous five years⁶¹. The Council is continuously monitoring air quality in the borough and has found that air quality is relatively good on the whole for the pollutants which are monitored.
- 7.1.7 Air quality impacts from vehicles are most likely to occur within 200m of the road^{62,63}. It is therefore considered likely that, where residents are living within 200m of a relatively busy road, they will be exposed to poor air quality and potential long term health consequences.
- 7.1.8 The issue of air quality has been considered under SA Objective 2 'Air', which seeks to improve air quality, creating cleaner and healthier air. Indicators for this objective include the number of residents in areas of poor air quality, proximity to pollutants (e.g. main roads), local increases in traffic or congestion and proximity to AQMAs.

⁵⁹ Newcastle-under-Lyme Borough Council (2024) Revocation of AQMA in Little Madeley. Available at: <https://www.newcastle-staffs.gov.uk/protection/revocation-air-quality-management-area-aqma> [Date accessed: 03/07/24]

⁶⁰ Newcastle-under-Lyme Borough Council (2019) Air Quality Action Plan 2019-2024. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s28367/4%20App%20AQAP%202019-2024.pdf> [Date accessed: 23/01/24]

⁶¹ Newcastle-under-Lyme Borough Council (2023). Air quality management. Available at: <https://www.newcastle-staffs.gov.uk/protection/air-quality-management/9> [Date accessed: 22/01/24]

⁶² Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: <https://www.standardsforhighways.co.uk/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date accessed: 03/07/24]

⁶³ The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "*beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant*". Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 03/07/24]

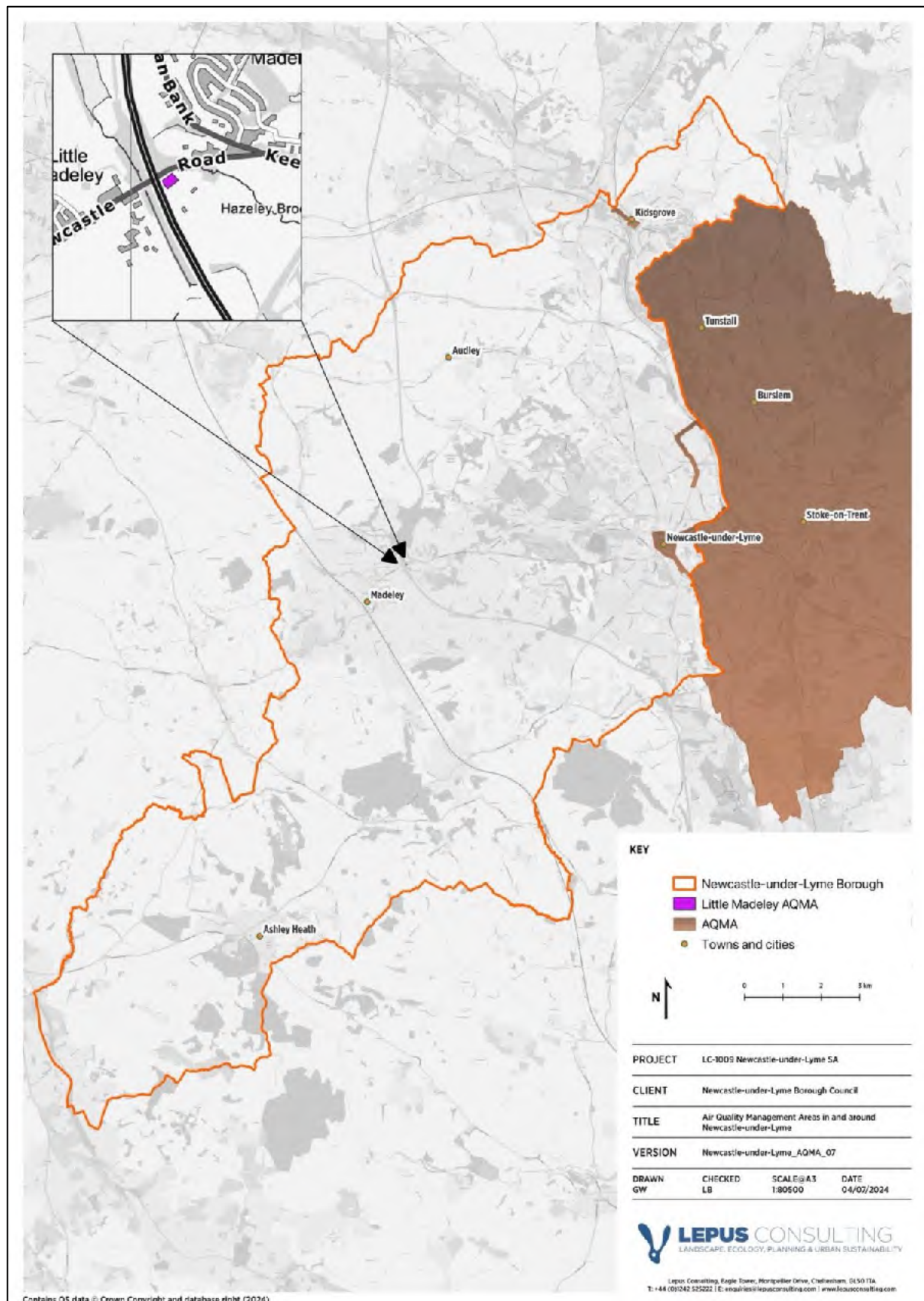


Figure 7.1: AQMAs in and surrounding Newcastle-under-Lyme


Key issues relating to air quality

- ⇒ There are currently three AQMAs within Newcastle-under-Lyme, all declared in 2015, with NO₂ being the pollutant: 'Kingsgrove' AQMA, 'Newcastle-under-Lyme Town' AQMA and 'Maybank, Wolstanton, Porthill' AQMA.
- ⇒ New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality.
- ⇒ Newcastle-under-Lyme is above the England average for cases of asthma, chronic obstructive pulmonary disease and coronary heart disease. These diseases are considered indicators of poor air quality.
- ⇒ Approximately 5.0% of mortality in the borough was attributable to particulate matter air pollution in 2021.


7.2 Impacts on air

7.2.1 **Box 7.1** presents a plan-wide summary of the adverse impacts on air that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 7.1: Summary of identified impacts on air

Impact on air	Summary of identified impact
 <p>Reduction in air quality with implications for human health and biodiversity</p>	<p>Impacts on air quality may arise during construction and operation of different types of development proposed within the Local Plan. This includes new development which would be likely to increase the volume of traffic and associated emissions within the Plan area.</p> <p>An increase in air pollution from vehicle emissions could potentially have adverse impacts on biodiversity assets through mechanisms such as eutrophication, acidification and increased toxicity. Some sensitive ecosystems, including European sites and SSSIs (see Chapter 8) are vulnerable to the impact of atmospheric nitrogen deposition.</p> <p>Exposure to sources of air pollution could potentially have adverse effects on the health of local residents, with children, the elderly and those of poor health identified as the most vulnerable. Development within or in close proximity to AQMAs would be likely to make it more difficult to achieve National Air Quality Objectives⁶⁴ within these areas.</p> <p>At the time of assessment, 13 allocated sites were identified to be located within, or within 200m of, an AQMA. This includes nine sites coinciding or being located within 200m of 'Newcastle-under-Lyme Number 2' AQMA, two sites located within 200m of 'Stoke-on-Trent' AQMA, and two sites located within 200m of 'Kingsgrove' AQMA.</p>


⁶⁴ Defra (no date) UK and EU Air Quality Limits. Available at: <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> [Date accessed: 19/06/24]


Impact on air	Summary of identified impact
	Some 30 allocated sites are located within 200m of a main road, raising the potential for air quality impacts associated with atmospheric pollution from vehicular traffic.
 <p>Increased pollutant emissions</p>	<p>The scale of development proposed in the Local Plan is likely to increase the volume of traffic within the Plan area, and as a result, associated transport-related emissions including NO₂ and PM₁₀ will be released into the atmosphere, with potential adverse effects on local air quality.</p>

7.3 Local Plan mitigation

- 7.3.1 **Box 7.2** lists the policies within the Local Plan which would be likely to mitigate, either fully or partially, some of the identified adverse impacts on air. Where there are no mitigating policies, or the contents of the Local Plan only partially mitigates the adverse impacts, a residual adverse effect is identified.

Box 7.2: Mitigating effects of the Local Plan policies on air

Policy mitigation for air	Summary of mitigating effect
 <p>Policy mitigation for impact of reduction in air quality</p>	<p>Policy SE1: Pollution and Air Quality states that “<i>development proposals that are likely to result in detrimental impacts on pollution, including on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts</i>”. The policy will ensure that the development will not worsen air quality within AQMAs and will consider the cumulative effects of emissions from proposed developments.</p> <p>Policy CRE1: Climate Change will encourage new developments to incorporate measures to improve energy efficiency and is likely to help reduce the demand for energy, potentially leading to lower emissions of air pollutants during construction and occupation of development.</p> <p>Policy CRE2: Renewable Energy promotes alternate renewable and low carbon technologies that can contribute towards improved air quality by reducing pollutants.</p> <p>Policy IN2: Transport and Accessibility will tackle air pollution issues by focusing on reducing the need to travel and by encouraging the uptake of sustainable transport options, which will be likely to result in improved air quality in Newcastle-under-Lyme.</p> <p>Policies PSD7: Design, SE14: Green and Blue Infrastructure and SE8: Biodiversity and Geodiversity include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as filtration of air pollutants and could potentially result in improvements to air quality.</p> <p>Various site policies set out requirements for an air quality assessment and mitigation strategy to be conducted at multiple sites in proximity to AQMAs or main roads, which is likely to help ensure the construction and occupation of new development avoids leading to a decline in air quality.</p>

Policy mitigation for air	Summary of mitigating effect
 <p>Policy mitigation for impact of increased pollutant emissions</p>	<p>Policy IN2: Transport and Accessibility will focus on reducing the need to travel and by encouraging the uptake of sustainable transport options, which will be likely to result in reduced transport related emissions in Newcastle-under-Lyme.</p> <p>Policies RET4: Newcastle-under-Lyme Town Centre and RET5: Kidsgrove Town Centre promote sustainable and active travel initiatives, which could lead to due to reduced reliance on private car use and consequently lower emissions of associated air pollutants.</p> <p>Policy IN3: Access and Parking supports the provision of electric vehicle infrastructure such as charging points, and secure bicycle storage, facilitating the uptake of low or zero emission vehicles and active travel, which will be expected to reduce transport related emissions in Newcastle-under-Lyme.</p> <p>Policy CRE2: Renewable Energy promotes alternate renewable and low carbon technologies that can contribute towards reduced emissions of pollutants.</p> <p>Various site policies set out requirements for an air quality assessment and mitigation strategy to be conducted at multiple sites in proximity to AQMAs or main roads, which is likely to help reduce emissions attributed to new development.</p>

7.4 Residual effects on air

7.4.1 Drawing on the information presented in **Box 7.1** and **7.2**, **Box 7.3** explores the nature of the residual effects on air.

Box 7.3: Residual effects for air

Residual effects	Further details of the residual effect
Reduction in air quality	<p>The introduction of 8,000 dwellings and 63ha of employment floorspace would be expected to increase vehicle emissions in the Plan area. The policies outlined in Box 7.2 are expected to reduce the likelihood of adverse impacts occurring and could potentially help reduce these adverse impacts. However, due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality will be expected to have residual adverse effects which cannot be fully mitigated through the Local Plan policies alone.</p> <p>Over time, technological advances, such as transitioning to electric vehicles and promoting sustainable transport options, along with legislative changes and behavioural shifts, are expected to improve air quality by reducing vehicle emissions. Strategies outlined in various plans and policies, including the Local Transport Plan, Air Quality Action Plan, Clean Air Strategy and 25 Year Environment Plan, are likely to reduce air pollution from development activities to some extent.</p> <p>A reduction in air quality across Newcastle-under-Lyme would be expected to be a long-term but potentially temporary significant effect.</p>

Residual effects	Further details of the residual effect
Increased pollutant emissions	<p>The policies outlined in Box 7.2, coupled with technological advances and alternative solutions to energy generation and transport modes, will help to reduce the likelihood of adverse impacts occurring. However, an increase in pollutants including NO₂ and PM₁₀ is expected following the development proposed within Newcastle-under-Lyme.</p> <p>Increased traffic volumes and increased energy demand will be likely as a result of the introduction of 8,000 dwellings and 63ha of employment floorspace. Increased pollutant emissions will be likely as a result of the new development and therefore associated impacts on air quality.</p> <p>An increase in pollutant emissions will be likely to be a long-term but potentially temporary significant effect.</p>

8 Biodiversity, flora and fauna

8.1 Baseline

Internationally designated sites

- 8.1.1 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive⁶⁵ and Special Protection Areas (SPAs) classified under the Birds Directive⁶⁶. Additionally, the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated European sites.
- 8.1.2 These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU have become part of the National Site Network.
- 8.1.3 The borough contains two statutory protected Ramsar sites: Midland Meres and Mosses Phase 1 & 2 at Betley Mere⁶⁷. Under the Ramsar Convention, these sites are recognised as wetlands of international importance.
- 8.1.4 The Regulation 18 HRA Screening (2023)⁶⁸ identified the potential for likely significant effects on a number of European sites regarding:
- Deterioration in air quality;
 - Reduction in water quality and quantity; and
 - Increased recreational pressure.
- 8.1.5 The Regulation 19 HRA (2024)⁶⁹ provides an updated screening and appropriate assessment of the emerging Local Plan. **Table 8.1** summarises the impact pathways that were explored further in the HRA.

⁶⁵ European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN> [Date accessed: 06/01/24]

⁶⁶ European Directive 2009/147/EC on the conservation of wild birds. Available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN> [Date accessed: 06/01/24]

⁶⁷ Natural England. Designated site details. Available at: <https://designatedsites.naturalengland.org.uk> [Date accessed: 22/01/24]

⁶⁸ Lepus Consulting (2023) Newcastle-under-Lyme Draft Local Plan 2020-2040 Regulation 18 Habitats Regulation Assessment – Screening. May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37505> [Date accessed: 04/07/24]

⁶⁹ Lepus Consulting (2024) Newcastle-under-Lyme Publication Draft Local Plan 2020-2040 Regulation 19 Habitats Regulations Assessment.

Table 8.1: Summary of impact pathways to European sites which may be associated with the Plan (extracted from the HRA)

Potential impact pathways?	Air quality	Water quality and quantity changes	Recreational pressure	Urbanisation effects
Midland Meres & Mosses Phase 1 Ramsar	No	Yes	Yes	Yes
Midland Meres & Mosses Phase 2 Ramsar	Yes	Yes	Yes	Yes
West Midland Mosses SAC	No	Yes	No	No
Pasturefields Salt Marsh SAC	No	Yes	No	No
Cannock Chase SAC	No	Yes	No	No
Severn Estuary SAC, SPA and Ramsar	No	Yes	No	No
Humber Estuary SAC, SPA and Ramsar	No	Yes	No	No
Mersey Estuary SPA and Ramsar	No	Yes	No	No
Peak District Dales SAC	No	Yes	No	No
Peak District Moors (South Pennine Moors Phase 1) SPA	No	Yes	No	No
South Pennine Moors SAC	No	Yes	No	No

Nationally designated sites

8.1.6 Natural England designates Sites of Special Scientific Interest (SSSIs) in England under the Wildlife and Countryside Act 1981 (as amended). There are five SSSIs in the borough (see **Figure 8.1**):

- Burnt Wood SSSI (located in Loggerheads Ward – 5.51% unfavourable condition, recovering and 94.49% unfavourable, no change)
- Maer Pool SSSI (located in Maer & Whitmore Ward – 100% unfavourable, recovering)
- Black Firs & Cranberry Bog SSSI (located in Madeley & Betley Ward – 100% unfavourable, no change)
- Betley Mere SSSI (located in Madeley & Betley Ward – 38.36% unfavourable, recovering and 61.64% unfavourable, no change))
- Metallic Tileries, Parkhouse SSSI (located in Bradwell Ward – 100% unfavourable, no change)

8.1.7 Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a tool for rapid initial assessment of the potential risks to SSSIs posed by development proposals⁷⁰. Newcastle-under-Lyme is located within various SSSI IRZs, which is widespread across the entire Borough.

8.1.8 National Nature Reserves (NNRs) were established to protect some of the most important habitats, species and geology in the country and to provide 'outdoor laboratories' for research. Of the 224 NNRs in England, there are no NNRs within the borough. The nearest NNRs to the borough are Hulme Quarry NNR 6km east of the borough, and Wybunbury Moss that is located 4.5km west of the borough.

Ancient woodland

8.1.9 Ancient woodland is an area that has been wooded continuously since at least 1600AD, including 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the NPPF⁷¹.

8.1.10 There are multiple areas of ancient woodland in Newcastle-under-Lyme, mostly in the south of the borough where they are fairly evenly distributed (see **Figure 8.1**).

Local Nature Reserves

8.1.11 Natural England encourages LPAs to formally designate appropriate sites as Local Nature Reserves (LNR) under Section 21 of the National Parks and Access to the Countryside Act 1949. LNR designations demonstrate a commitment by the local authority to manage land for biodiversity, protect it from inappropriate development and provide opportunities for local people to study and enjoy wildlife. Four LNRs lie within Newcastle-under-Lyme (see **Figure 8.2**):

- Bathpool Park LNR
- Bateswood LNR
- Pool Dam Marshes LNR
- Bradwell Woods LNR.

Local Wildlife Sites

8.1.12 Local Wildlife Sites (LWSs) are non-statutory designated sites, identified by LPAs in partnership with nature conservation charities, statutory agencies and ecologists, although they are privately owned. In Newcastle-under-Lyme, LWSs are comprised of Sites of Biological Importance (SBIs). Grade 1 SBIs are of a greater ecological value than Grade 2 SBIs. Some 86 LWSs are located in Newcastle-under-Lyme (see **Figure 8.2**).

⁷⁰ Natural England (2024) Natural England's Impact Risk Zones for Sites of Special Scientific Interest. Available online at: <https://www.data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones-england> [Date accessed: 04/07/24]

⁷¹ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 04/07/24]

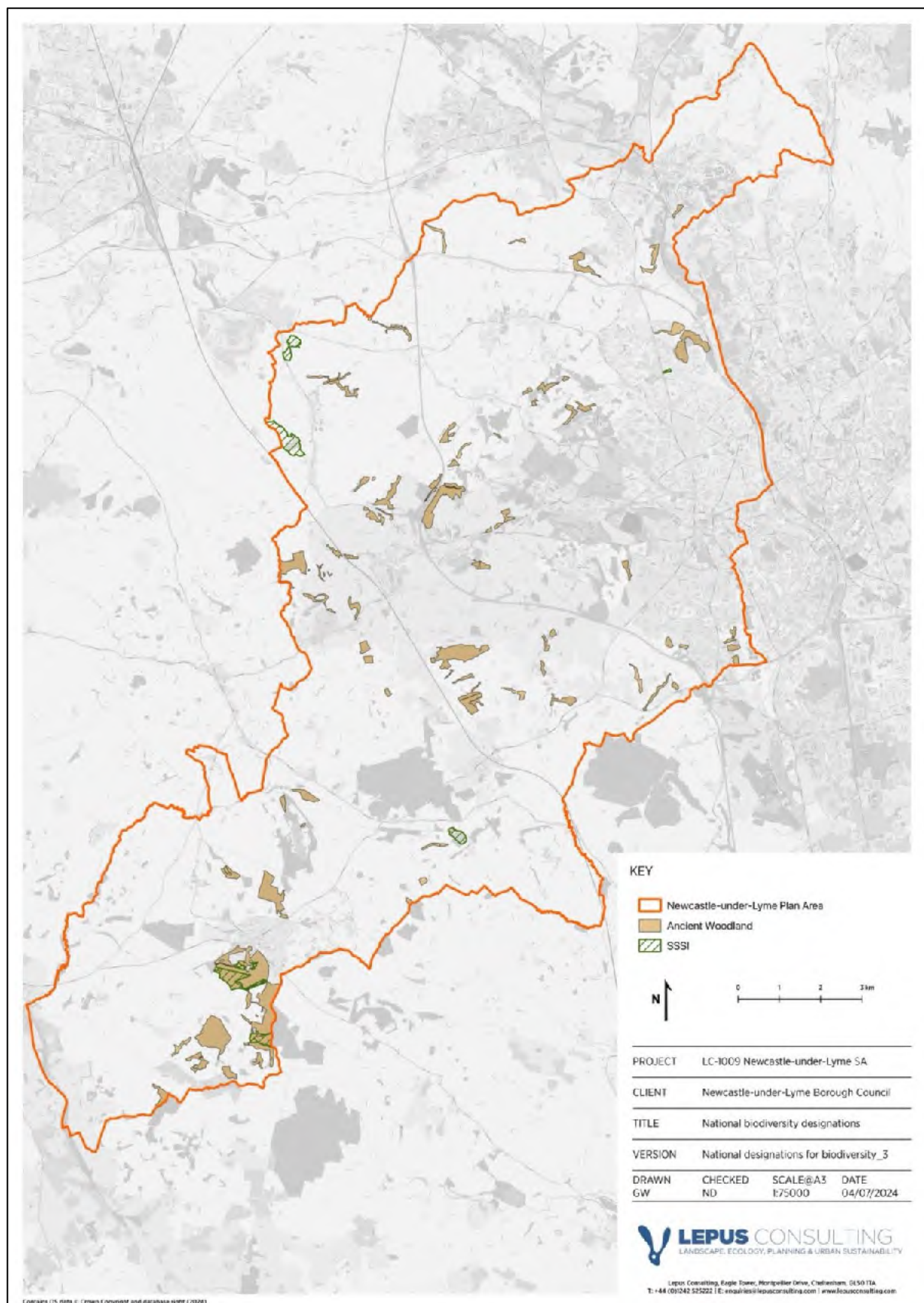


Figure 8.1: National designations for biodiversity in Newcastle-under-Lyme

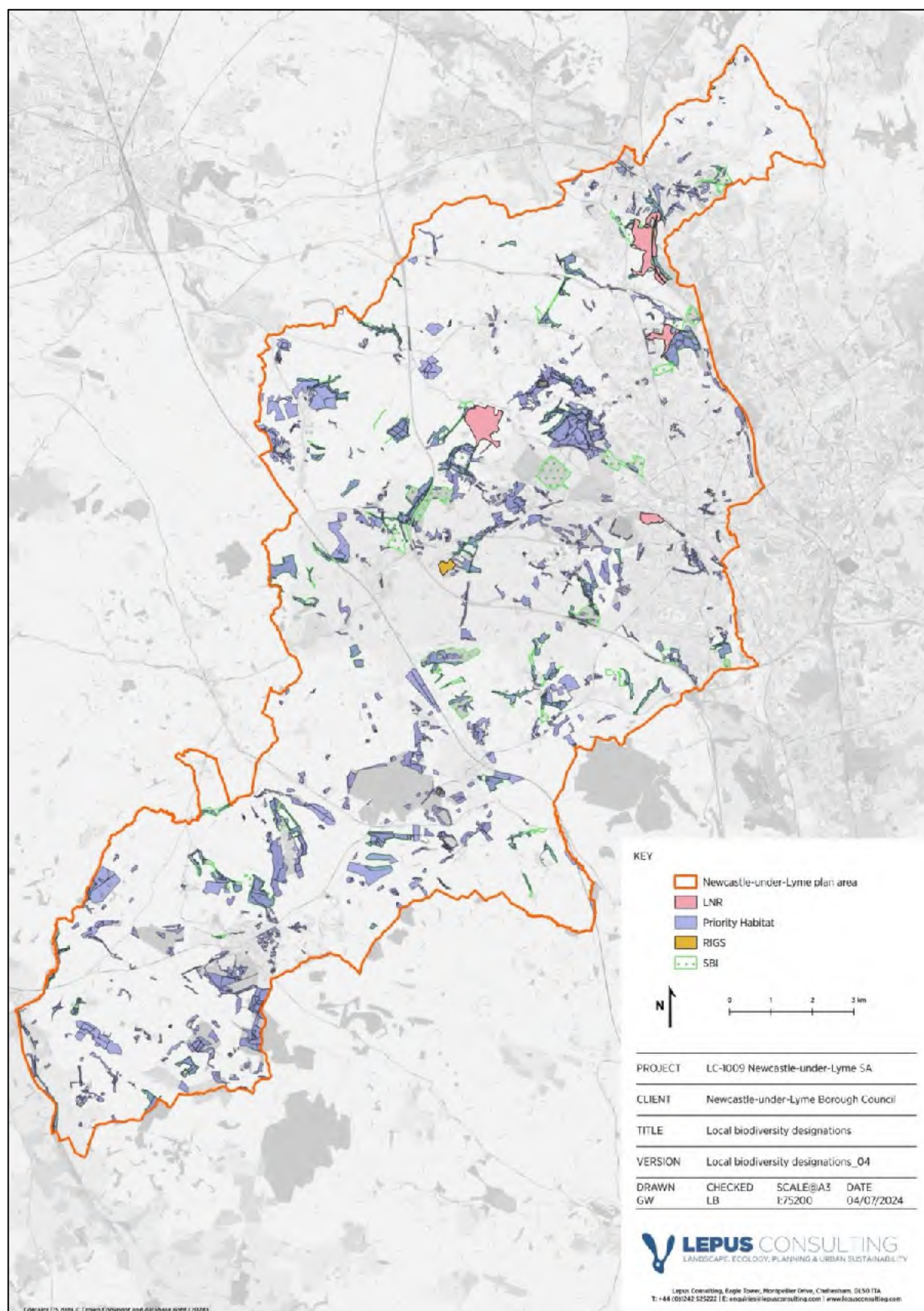


Figure 8.2: Local biodiversity and geodiversity designations in Newcastle-under-Lyme

Habitats and species

- 8.1.13 The NPPF⁷² paragraph 185, outlines policy for UK Priority Habitats which states that plans should “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*”.
- 8.1.14 There are a wide range of priority habitats within Newcastle-under-Lyme. The borough contains 1,797.01 hectares of priority habitats identified by Natural England, which is primarily dominated by deciduous woodland (see **Figure 8.3**). These are priority habitats of the UK Biodiversity Action Plan.

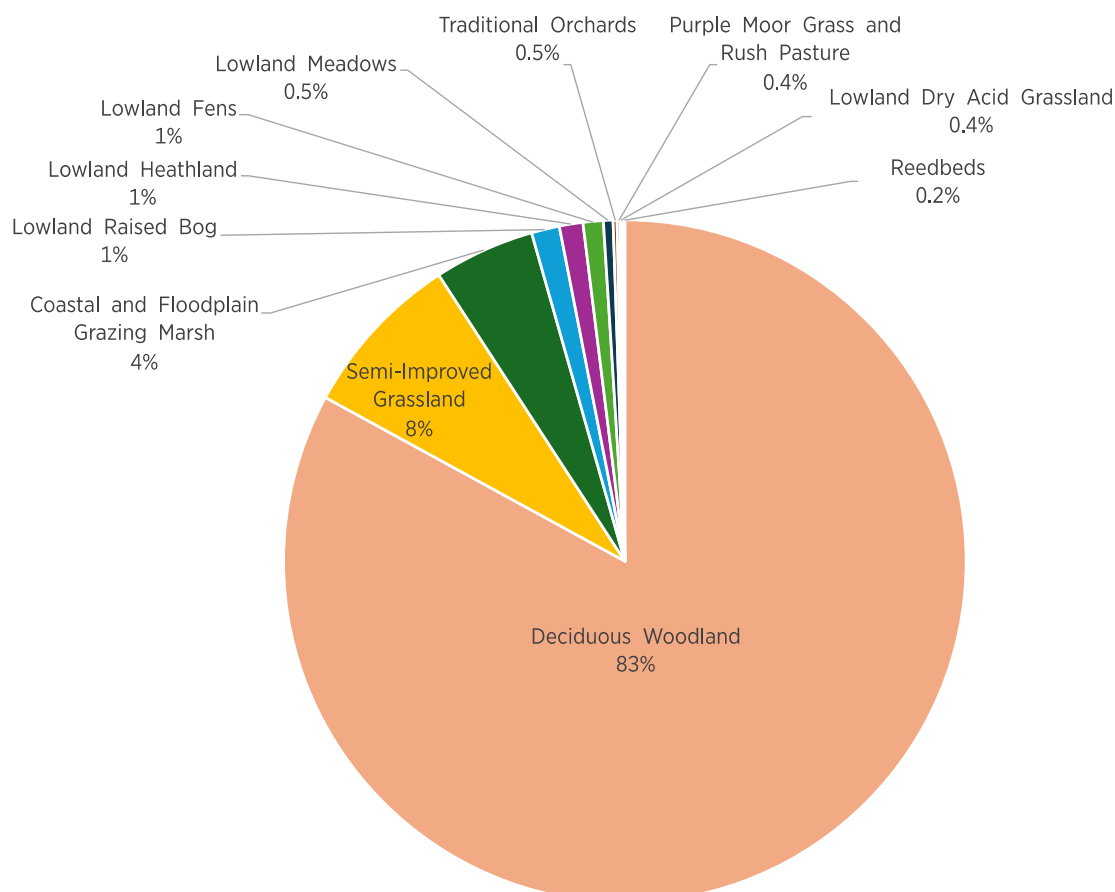


Figure 8.3: Priority habitats within Newcastle-under-Lyme

- 8.1.15 The Environment Improvement Plan (EIP) 2023⁷³ establishes a framework for nature recovery and is supported by the associated legislation including the Environment Act 2021. The supporting legislation will roll out of Nature Recovery Strategies, enhancing habitats through the Species Survival Fund, and creating, restoring, and extend around 70 areas for wildlife through projects including new NNRs, and the next rounds of the Landscape Recovery Projects.

⁷² DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 04/07/24]

⁷³ Department for Environment, Food & Rural Affairs (2023) Environment Improvement Plan. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf [Date accessed: 04/07/24]

8.1.16 NuLBC, working with Staffordshire County Council and other LPAs, is in the process of creating a Local Nature Recovery Strategy (LNRS) which is supported by Staffordshire Wildlife Trust to produce Newcastle-under-Lyme Nature Recovery Mapping⁷⁴, that will identify where habitats may be created or enhanced to contribute to nature recovery.

8.1.17 Green Infrastructure helps to conserve and enhance local habitats and ecological corridors. The Green Infrastructure Framework⁷⁵ 2023 will help to increase green cover and provide a structure to analyse where greenspace in urban environments is needed the most.

River ecology

8.1.18 Newcastle-under-Lyme lies within the Humber, North West, and the Severn River Basins Districts. The River Basin Management Plans (RBMPs) for 2022⁷⁶ for the Humber, North West and Severn River Basins provide an update on the ecological status of the water environment as summarised in **Table 8.1**.

8.1.19 The RBMPs will support the following objectives of the Water Framework Directive:

- To prevent deterioration of the status of surface waters and groundwater;
- To achieve objectives and standards for protected areas;
- To aim to achieve good status for all water bodies or, for heavily modified water bodies and artificial water bodies, good ecological potential and good surface water chemical status;
- To reverse any significant and sustained upward trends in pollutant concentrations in groundwater;
- The cessation of discharges, emissions and losses of priority hazardous substances into surface waters; and,
- Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants.

⁷⁴ Staffordshire Wildlife Trust (2020). Newcastle Borough Council Nature Recovery Network Mapping. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/633/nature-recovery-network-map-2023> [Date accessed: 05/01/24]

⁷⁵ Natural England. Green Infrastructure Framework (2023). Available at: <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework> [Date accessed: 22/01/24]

⁷⁶ Environment Agency (2022). River basin management plans updated 2022. Available at: <https://www.gov.uk/guidance/river-basin-management-plans-updated-2022#accessing-the-rbmps> [Date accessed: 29/01/24]

Table 8.2: *Ecological status of waterbodies within the Humber (2019)⁷⁷, Severn (2022)⁷⁸, and the North West (2023)⁷⁹ river basins*

Ecological status or potential	Definition of status	No. of water bodies – Humber	No. of water bodies – Severn	No. of water bodies – North West
High	Near natural conditions. No restriction on the beneficial uses of the water body. No impacts on amenity, wildlife or fisheries.	0	0	1
Good	Slight change from natural conditions as a result of human activity. No restriction on the beneficial uses of the water body. No impact on amenity or fisheries. Protects all but the most sensitive wildlife.	150	139	130
Moderate	Moderate change from natural conditions as a result of human activity. Some restriction on the beneficial uses of the water body. No impact on amenity. Some impact on wildlife and fisheries.	646	458	390
Poor	Major change from natural conditions as a result of human activity. Some restrictions on the beneficial uses of the water body. Some impact on amenity. Moderate impact on wildlife and fisheries.	159	137	61
Bad	Severe change from natural conditions as a result of human activity. Significant restriction on the beneficial uses of the water body. Major impact on amenity. Major impact on wildlife and fisheries with many species not present.	27	16	17

Geodiversity

8.1.20 Geology in the borough is dominated by the Warwickshire Group of the Carboniferous age, Bridgnorth Sandstone Formation of the Permian age and Sherwood Sandstone Group of the Triassic age⁸⁰.

8.1.21 Sites of important geodiversity in the borough have either been designated as a Regionally Important Geological Sites (RIGS) or as an SSSI. This includes the following (as shown on **Figure 8.2**):

- Apedale, Furnace Quarry
- Butterson Church Quarry
- Red Hill Rifle Range
- Madeley Heath Tileries (Ridgehill Clay Pit)

⁷⁷ Environment Agency (2023) Humber River Basin Management Plan summary and cross border catchments (England and Wales). Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/4/print> [Date accessed: 22/01/24]

⁷⁸ Environment Agency (2022). Severn River Basin Management Plan summary and cross border catchments (England and Wales). Available at: <https://www.gov.uk/government/publications/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales> [Date accessed: 22/01/24]

⁷⁹ Environment Agency (2023). North West River Basin Management Plan summary and cross border catchments (England and Wales). Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/12/print> [Date accessed: 22/01/24]

⁸⁰ Geodiversity Staffordshire, Staffordshire Geodiversity Action Plan, 2010. Available online at: <http://staffs-ecology.org.uk/geodiversity-action-plan/> [Date accessed: 04/07/24]

- Quarry Bank Quarry
- Job's Wood Quarry
- Miry Quarry
- Kent Hill Quarry
- Bradwell Wood Quarry
- Birchenwood Quarry
- Mount Pleasant Quarry, west
- Mow Cop Folly Quarries
- Heighley Lane Quarry
- Metallic Tileries, Parkhouse

8.1.22 Biodiversity, flora and fauna have been predominantly considered under SA Objective 3 'Biodiversity and Geodiversity' which aims to help protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of the borough.

Key issues relating to biodiversity, flora and fauna

- ⇒ There are several internationally, nationally and locally designated sites of biological and geological importance in the borough.
- ⇒ Important sites and habitats may be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution.
- ⇒ It will be necessary to ensure there will be no adverse impact on the site integrity of European sites, either alone or in-combination, as a result of the Newcastle-under-Lyme Local Plan via the emerging HRA.
- ⇒ The entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition.
- ⇒ It is essential that there is a coherent ecological network of habitats that enable the free movement of species and gene exchange, and that this is not compromised through development proposed in the Local Plan.
- ⇒ There is an extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares. Both should be conserved and enhanced.



Key issues relating to areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (the Birds and Habitats Directives)



- ⇒ The following vulnerabilities have been identified in the HRA screening process alongside the Local Plan preparation:
 - Recreation (Midland Meres and Mosses Phase 1 Ramsar, Midland Meres and Mosses Phase 2 Ramsar);
 - Water quality and quantity issues (Midland Meres & Mosses Phase 1 Ramsar, Midland Meres & Mosses Phase 2 Ramsar, West Midland Mosses SAC, Pasturefields Salt Marsh SAC, Cannock Chase SAC, Severn Estuary SAC, SPA and Ramsar, Humber Estuary SAC, SPA and Ramsar, Mersey Estuary SPA and Ramsar, Peak District Dales SAC, Peak District Moors (South Pennine Moors Phase 1) SPA, South Pennine Moors SAC); and
 - Air quality (Midland and Meres and Mosses Phase 2 Ramsar).
- ⇒ The Publication Draft HRA (2024) includes an appropriate assessment which was undertaken to assess these identified likely significant effects more precisely in the context of European site conservation objectives, and the protective framework provided by the emerging Local Plan policies, alongside existing planning policy frameworks.
- ⇒ Taking into consideration these factors, the HRA concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

8.2 Impacts on biodiversity, flora and fauna


8.2.1 **Box 8.1** presents a plan-wide summary of the adverse impacts on biodiversity, flora and fauna that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 8.1: Summary of identified impacts on biodiversity, flora and fauna

Impact on biodiversity	Summary of identified impact
 <p>Threats or pressures to European sites</p>	<p>A number of likely significant effects (LSEs) have been identified in the HRA screening process with regard to several European sites as described in section 8.1; this includes adverse effects across a number of impact pathways including regarding air quality, water quality and quantity, recreational pressures and functionally linked land.</p>
 <p>Threats or pressures to nationally designated biodiversity sites</p>	<p>No allocated sites are located within or immediately adjacent to SSSIs, however one allocated site (Site LW53) is located within an IRZ which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.</p> <p>Potential impacts on SSSIs include increased recreational disturbance caused by residents visiting the designated sites (including direct effects such as trampling and indirect effects of disturbance to ground nesting birds from dog walking), and deterioration of local air quality due to increased traffic levels.</p>

Impact on biodiversity	Summary of identified impact
 <p>Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites</p>	<p>Adverse impacts due to development on locally designated sites could potentially include direct impacts on habitats and / or indirect impacts such as increased recreational disturbance caused by local residents visiting these sites.</p> <p>Five allocated sites have been identified as having potential to result in adverse impacts on LNRs: Sites BW1, BL18 and TK17 are located in close proximity to 'Bathpool Park' LNR, and Sites KS19 and TB23 are located in close proximity to 'Pool Dam Marshes' LNR.</p> <p>Four allocated sites (Sites H10, KL13, SP23 and TB19) coincide with biodiversity alert sites (BAS) and two allocated sites (KL15 and SP11(2)) are located adjacent to BAS.</p> <p>Two allocated sites (BL18 and TB19) coincide with sites of biological importance (SBI) and a further two allocated sites (KL13 and KL15) are adjacent to SBIs.</p> <p>No adverse impacts have been identified with regard to RIGS or geodiversity in general.</p>
 <p>Loss or degradation of habitats and species of principal importance, priority habitats and ancient woodland</p>	<p>Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024)⁸¹. These habitats can support a range of species of principal importance.</p> <p>Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands.</p> <p>Potential impacts associated with loss of habitats includes:</p> <ul style="list-style-type: none"> • Direct impacts: Permanent loss of priority habitat in short term. • Secondary impacts: Such as reduced habitat connectivity and increased fragmentation, with increased fragility of habitats. • Indirect effects: Reduced ecological coherence.


⁸¹ HM Government (2024) Statutory biodiversity metric tools and guides. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides> [Date accessed: 04/07/24]

Impact on biodiversity	Summary of identified impact
 <p>Fragmentation of the ecological network and loss of distinctive habitats</p>	<p>The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value.</p> <p>Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur. The assessment recognises these impacts at all receptor types at the landscape scale. Impacts include:</p> <ul style="list-style-type: none"> • Direct and cumulative effects associated with fragmentation of the habitat mosaic. • Indirect impacts of reduction of genetic diversity. • Secondary effects of loss of species richness and diversity. <p>It should also be acknowledged that previously developed land and urban areas can also provide biodiversity value, in some cases to a greater extent than undeveloped locations such as intensively farmed agricultural land. Developments in urban areas may also result in losses to the GI network, and should consider ways to accommodate and retain ecological links amongst the built form.</p>


8.3 Local Plan mitigation

- 8.3.1 Several policies within the NuLBC Local Plan aim to protect and enhance biodiversity within the borough. The policies discussed in **Box 8.2** would be expected to provide effective protection for biodiversity assets, and therefore, would be expected mitigate some of the adverse impacts identified in **Box 8.1**.

Box 8.2: *Mitigating effects of the Local Plan policies on biodiversity, flora and fauna*

Policy mitigation for biodiversity	Summary of mitigating effect
 <p>Threats or pressures to European sites</p>	<p>Policy SE8: Biodiversity and Geodiversity sets out the Council's strategy for conservation and enhancement of biodiversity, geodiversity and ecological networks in the borough. The policy sets out the requirement to follow the mitigation hierarchy which will protect European sites from adverse effects.</p> <p>An HRA has been prepared to identify any likely significant effects as a consequence of the emerging Local Plan on European sites within the influence of the Local Plan. The nature of effects and the mitigation of those effects are evaluated in the emerging HRA.</p>

Policy mitigation for biodiversity	Summary of mitigating effect
 <p>Threats or pressures to nationally designated biodiversity sites</p>	<p>Policy SE8: Biodiversity and Geodiversity sets out the Council's strategy for conservation and enhancement of biodiversity, geodiversity and ecological networks in the borough. The policy sets out the requirement to follow the mitigation hierarchy, ensuring that loss of designated nature conservation sites including SSSIs is avoided, mitigated or as a last resort, compensated. Following the mitigation hierarchy will protect and conserve nationally designated biodiversity sites within the borough.</p>
 <p>Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites</p>	<p>Policy SE8: Biodiversity and Geodiversity sets out the Council's strategy for conservation and enhancement of biodiversity, geodiversity and ecological networks in the borough. The policy sets out the requirement to follow the mitigation hierarchy, ensuring that loss of designated nature conservation and geological sites is avoided, mitigated or as a last resort, compensated. Following the mitigation hierarchy will help to protect and conserve locally designated and non-statutory designated biodiversity and geodiversity sites within the borough.</p>
 <p>Loss or degradation of habitats of principle importance (priority habitats) and ancient woodland</p>	<p>Policy SE8: Biodiversity and Geodiversity sets out the Council's strategy for conservation and enhancement of biodiversity, geodiversity and ecological networks in the borough.</p> <p>Policy SE7: Biodiversity Net Gain, supported by Policy IN1: Infrastructure, encourages BNG to link with the emerging Nature Recovery Network and Local Nature Recovery Strategy, helping to conserve and enhance biodiversity within the borough.</p> <p>Policy SE11: Trees, Hedgerows and Woodland aims to create, retain and protect trees, hedgerows and woodlands, including ancient woodland and veteran trees across the Plan area. The policy will ensure that trees are only lost when unavoidable and that appropriate replacements are provided, and establish buffer zones between development and woodlands.</p>

Policy mitigation for biodiversity	Summary of mitigating effect
 <p>Fragmentation of the ecological network and loss of distinctive habitats</p>	<p>Policy SE7: Biodiversity Net Gain, supported by Policy IN1: Infrastructure encourages BNG to link with the emerging Nature Recovery Network and Local Nature Recovery Strategy, helping to conserve and enhance biodiversity within the borough.</p> <p>Policies SE14: Green and Blue Infrastructure, PSD7: Design, SE6: Open Space, Sports and Leisure Provision, CRE1: Climate Change, SA1: General Requirements and various site policies seek improved provision and connectivity of green/blue infrastructure, to retain and improve habitat connectivity and ecological corridors amongst built development.</p> <p>Policy RET5: Kidsgrove Town Centre supports the provision of green routes and pocket parks within the town, complementing the GI provisions in the other policies.</p> <p>Policy SE10: Landscape encourages the use of native species in landscaping schemes, and integration of developments with existing green and blue infrastructure networks.</p> <p>Various site policies aim to create ecological buffers around Sites of Biological Importance (SBI) and Biodiversity Alert Sites (BAS). A significant number of site policies also require existing hedgerows and trees to be retained, whilst some policies encourage the creation of new areas of woodland.</p>

8.4 Residual effects on biodiversity, flora and fauna

- 8.4.1 Drawing on the information presented in **Box 8.1** and **8.2**, **Box 8.3** explores the nature of the residual effects and, where applicable, provides further recommendations for mitigation or enhancement of biodiversity, flora and fauna in Newcastle-under-Lyme.

Box 8.3: Residual effects for biodiversity, flora and fauna

Residual effects	Further details of the residual effect
Threats or pressures to European sites	Drawing on the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effect, the HRA Appropriate Assessment concluded that the Local Plan will have no adverse impact on site integrity at any European site, either alone or in-combination.
Threats or pressures to nationally designated biodiversity sites	Policy SE8 will be likely to mitigate adverse impacts on SSSIs arising from the Local Plan development. However, Site LW53 is located within a SSSI IRZ which states that any residential development of 50 or more houses outside existing settlements/urban area will require consultation with Natural England. Pending consultation with Natural England regarding Site LW53, the Local Plan is not expected to result in a residual adverse impact on SSSIs within the Plan area.

Residual effects	Further details of the residual effect
Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites	The Local Plan policies will be likely to mitigate adverse impacts arising from development proposals which are situated in close proximity to locally designated and non-statutory biodiversity assets. Potential residual impacts will not be significant as a result of the Local Plan policies that require conservation and enhancement of biodiversity assets and improvements to the wider GI network.
Loss or degradation of habitats and species of principal importance, priority habitats and ancient woodland	The Local Plan policies are expected to mitigate adverse impacts arising from development proposals which are situated in close proximity to ancient woodland and habitats of principal importance and will ensure that the loss of irreplaceable habitats, such as lowland fen will be refused unless there are wholly reasons and exceptional reasons, and a suitable compensation strategy exists. A negligible effect is identified overall.
Fragmentation of the ecological network and loss of distinctive habitats	<p>Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network.</p> <p>Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect.</p>

9 Climatic factors

9.1 Baseline

9.1.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. A major source of GHGs within the influence of LPAs is vehicle emissions. The majority of residents will have at least one vehicle per household. It is likely that residential development proposed within the Plan would result in more vehicles on the road, and consequently a likely increase in GHG emissions, contributing to the 'greenhouse effect' and exacerbating anthropogenic climate change. Encouraging active travel or use of public transport can be effective ways to help reduce vehicle numbers and as a result, reduce GHG emissions.

9.1.2 The Climate Change Act 2008⁸² is the basis for the UK's approach to tackling climate change. It requires emissions of carbon dioxide and other GHGs to be reduced and that climate change risks are prepared for, and establishes the framework to deliver these requirements. The Committee on Climate Change report 'Net Zero – The UK's contribution to stopping global warming'⁸³ recommended new emission targets: reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. The Net Zero Strategy⁸⁴ sets out policies and proposals for decarbonising all sectors of the UK economy to meet this target.

Renewable energy

9.1.3 One strategy to combat GHG emissions is to reduce the quantity of energy produced via fossil fuel led energy production⁸⁵. In the last two decades, there has been a significant increase in the volume of energy generated through renewable energy sources with approximately 44.5% of electricity generated in the UK from renewable sources in July to September 2023⁸⁶.

⁸² Climate Change Act 2008. Available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [Date accessed: 22/01/24]

⁸³ Committee on Climate Change (2019) Net Zero – The UK's contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 22/01/24]

⁸⁴ Department for Energy Security and Net Zero & DBEIS (2022) Net Zero Strategy: Build Back Greener. Available at: <https://www.gov.uk/government/publications/net-zero-strategy> [Date accessed: 22/01/24]

⁸⁵ RTPi (2018) Renewable Energy: Planning's role in delivering renewable energy in the new low carbon economy. Available at: <https://www.rtpi.org.uk/research/2018/june/renewable-energy/> [Date accessed: 22/01/24]

⁸⁶ Department for Energy Security and Net Zero (2023) Energy trends: UK, July to September 2023: Statistical Release 21 December 2023. Available at: https://assets.publishing.service.gov.uk/media/6513ffd13d371800146d0c5a/Energy_Trends_September_2023.pdf [Date accessed: 22/01/24]

- 9.1.4 The promotion of on-site renewable or low carbon technologies incorporated with new development in Newcastle-under-Lyme would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. This would help to reduce the volume of GHGs emitted into the atmosphere and would in turn reduce the borough's contributions towards the causes of climate change.

Carbon emissions

- 9.1.5 Carbon dioxide (CO₂) emissions per capita in Newcastle-under-Lyme were below average across the local authorities in Staffordshire⁸⁷ (see **Table 9.1**).

Table 9.1: Total and per capita territorial carbon dioxide emissions in 2021 in Newcastle-under-Lyme⁸⁸

Local authority	Total emissions (ktCO ₂)	Population estimate	Per capita emissions (tCO ₂)
Cannock Chase	323.8	100,590	3.2
East Staffordshire	656.0	124,477	5.3
Lichfield	643.6	106,909	6.0
Newcastle-under-Lyme	701.4	123,025	5.7
South Staffordshire	816.9	110,793	7.4
Stafford	868.8	137,231	6.3
Staffordshire Moorlands	1,069.6	95,993	11.1
Tamworth	239.9	78,838	3.0
Staffordshire Total	5,319.9	877,856	6.1

- 9.1.6 The requirement to improve the energy efficiency of homes stems from the legal requirements to reduce CO₂ emissions set out in the Climate Change Act 2008 and the government's Net Zero Strategy 2021. The Net Zero Strategy sets out to reduce greenhouse gas emissions by 55% by 2025, 68% by 2030, 78% by 2035 and 100% by 2050⁸⁹.

⁸⁷ CAMCO (2010) Staffordshire County-wide Renewable / Low Carbon Energy Study. Available at: https://www.staffsmoorlands.gov.uk/media/1216/CAMCO-Staffordshire-County-Wide-Renewable--Low-Carbon-Energy-Study-June-2010/pdf/Staffordshire_LDF_Evidence_Base_Report_V6_ISSUED_FINAL.pdf?m=1480440065920 [Date accessed: 23/01/24]

⁸⁸ Department for Energy Security and Net Zero & Department for Business, Energy and Industrial Strategy (2023) UK local authority and regional greenhouse gas emissions and national statistics 2005 – 2021. Available at: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics> [Date accessed: 22/01/24]

⁸⁹ HM Government (2021) Net Zero Strategy: Build Back Greener. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf [Date accessed: 23/01/24]

- 9.1.7 The significant majority of carbon emissions in Newcastle-under-Lyme are from the transport sector (see **Table 9.2**). Residents preferred choice of travel remains by private car use, where 2021 ONS data⁹⁰ identified that 27% of residents travel to work by private car or van. Total carbon emissions in the borough have been decreasing slowly between 2011 and 2021. In that time, there has been a slight decrease in industry and commercial carbons emissions, a significant decrease in domestic sourced carbon emissions and a minor decrease in transport associated emissions. The data from 2020 is inconsistent with data trends, owing to the coronavirus pandemic, causing significant reductions across different emission sources.

Table 9.2: CO₂ emissions by sector for each year from 2019-2021 in Newcastle-under-Lyme⁹¹

Period	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Waste Management	Total
2011	118.6	83.0	27.2	245.9	378.5	11.2	0.1	852.8
2019	108.7	20.6	21.5	180.1	371.9	11.4	0.1	702.7
2020	105.9	16.8	19.7	174.5	307.9	10.9	0.1	624.0
2021	117.8	27.2	22.6	181.0	352.0	12.4	0.1	701.4

Adapting to climate change

- 9.1.8 Climate change has the potential to result in a range of environmental risks within Newcastle-under-Lyme and nationally, such as those associated with increased heatwaves in the summer months and more frequent storm events in the winter. This can have implications across a range of receptors, such as for sewer capacity due to heavy rainfall and biodiversity in terms of the habitat distribution of species sensitive to local conditions.
- 9.1.9 Much of Newcastle-under-Lyme comprises Green Belt and agricultural land, with varying sizes of urbanised areas distributed across the borough. Woodland areas are present, but most are fragmented.
- 9.1.10 Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. Flooding is considered within **Chapter 15 – Water**, and loss of previously undeveloped land has been considered within **Chapter 14 – Soil**.

⁹⁰ ONS (2021). Method used to travel to work. Available at:
<https://www.ons.gov.uk/datasets/TS061/editions/2021/versions/1/filter-outputs/8378d897-7e3e-4c53-9938-f7df417d920f#get-data> [Date accessed: 29/01/24]

⁹¹ Department for Energy Security and Net Zero & Department for Business, Energy and Industrial Strategy (2023) UK local authority and regional greenhouse gas emissions and national statistics 2005 – 2021. Available at:
<https://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics> [Date accessed: 23/01/24]

- 9.1.11 The Green Infrastructure Framework⁹² will ensure that LPAs and developers meet the requirements in the NPPF to consider GI in local plans and in new development. The Plan area would benefit from GI enhancements to receive the associated benefits.
- 9.1.12 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. Although specific detail of development is outside the scope of a local plan, the Local Plan could potentially help to encourage the development of more energy efficient homes to help reduce the demand on energy and improve energy efficiency in the home, which can include Eco Houses, Zero Carbon Homes and Passivhaus⁹³.
- 9.1.13 Throughout the SA process, climate change has been considered under SA Objective 1 'Climate change' which seeks to minimise the borough's contributions towards climate change. However, it should be noted that climate change is a cross-cutting theme with relevance across all objectives of the SA Framework and SEA topics.

Key issues relating to climatic factors

- ⇒ The frequency and severity of flooding is set to increase due to the impacts of climate change.
- ⇒ The borough is expected to move towards warmer wetter winters, hotter drier summers, with an increase in the frequency and intensity of extreme events.
- ⇒ New development should incorporate energy efficiency measures and climate change adaptive features, in order to respond to predicted levels of climate change.
- ⇒ As of 2018, transport is responsible for 48.8% of carbon related emissions within the borough.
- ⇒ The borough's primary fluvial flood risk is along the Lyme Brook, a tributary of the River Trent. There is also a risk of fluvial flooding from the Lyme Brook in the villages of Silverdale, Knutton, and Cross Heath.
- ⇒ The borough is at risk of surface water flooding. The urban area of Newcastle and Silverdale has been identified in the Flood Risk Management Strategy as one of the top ten urban areas at risk of surface water flooding in the county.
- ⇒ Sewer flooding is a key issue in the borough, with Kidsgrove, Talke, Audley, and Bignall



⁹² Natural England. Green Infrastructure Framework (2023). Available at: <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework> [Date accessed: 24/06/24]

⁹³ Urbanist Architecture. How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date accessed: 24/06/24]

9.2 Impacts on climatic factors

9.2.1 **Box 9.1** presents a plan-wide summary of the adverse impacts on climatic factors that have been identified through the SA process.



***Box 9.1:** Summary of identified impacts on climatic factors*

Impact on climatic factors	Summary of identified impact
 <p>Increased GHG emissions</p>	<p>The proposed development of 8,000 dwellings and 63ha of employment floorspace within the Local Plan would be likely to increase to some extent local carbon emissions through increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production, and use of materials during construction. This impact is expected to contribute towards cumulative effects which exacerbate global climate change issues such as sea level rise and extreme weather events.</p> <p>Nine allocated sites are located within County Council-owned 'LZC opportunity areas', indicating that the proposed development on the sites could result in the loss of land with high potential suitability for renewable energy developments.</p>
 <p>Loss of multi-functional green infrastructure</p>	<p>The proposed development within the Local Plan would cumulatively result in the loss of a significant area of previously undeveloped land. Some of the proposed development could potentially also result in the loss of trees, hedgerows and other vegetation currently on site. Multi-functional green infrastructure is vital in helping to reduce the adverse impacts of climate change.</p>

9.3 Local Plan mitigation

9.3.1 Climate, infrastructure, managing flood risk, transport and green infrastructure policies within the Local Plan will be likely to help reduce adverse impacts of the proposed development within the Local Plan in regard to climatic factors. Policies which are anticipated to help mitigate the impacts identified in **Box 9.1**, are discussed in **Box 9.2**.

Box 9.2: Mitigating effects of the Local Plan policies on climatic factors

Policy mitigation for climatic factors	Summary of mitigating effect
 <p>Increased GHG emissions</p>	<p>Policy SE1: Pollution and Air Quality will ensure that the cumulative effects of emissions from proposed developments are considered, which could help to reduce air pollutants including GHGs.</p> <p>Policy CRE1: Climate Change, supported by SA1: General Requirements, will ensure that development contributes towards the mitigation of, and adaptation to climate change, ensuring net zero national targets are met. The policy will ensure development proposals are of sustainable design by improving energy efficiency and utilising low carbon or renewable energy sources.</p> <p>Policy CRE2: Renewable Energy promotes climate change resilience, encouraging the use of low-carbon and renewable energy sources, reducing the reliance on energy produced from fossil fuels. An energy statement will be required for major development proposals, ensuring 10% of energy is from renewables.</p> <p>Policies IN1: Infrastructure, IN2: Transport and Accessibility and IN4: Cycleways, Bridleways and Public Rights of Way and various site policies promote measures to reduce the need to travel and encourage the uptake of sustainable transport options, as well as the development of walkable neighbourhoods, which are likely to contribute to climate change mitigation through reduced transport-associated GHG emissions.</p> <p>Policies RET4: Newcastle-under-Lyme Town Centre and RET5: Kidsgrove Town Centre promote sustainable and active travel initiatives, which could help to mitigate climate change through encouraging less reliance on private car use and lead to a reduction in transport-associated GHG emissions.</p>
 <p>Loss of multi-functional green infrastructure</p>	<p>Policy CRE1: Climate Change and Policy SA1: General Requirements requires developments to include green and blue infrastructure (GI and BI), seeking opportunities to enhance ecosystem services such as carbon sequestration.</p> <p>Various Local Plan policies, including Policies PSD7: Design, SE14: Green and Blue Infrastructure, SE8: Biodiversity and Geodiversity and various site policies include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as filtration of air pollutants including GHGs.</p> <p>Policy SE11: Trees, Hedgerows and Woodland includes the restoration and enhancement of trees, hedgerows and woodland and Policy SE13: Soil and Agricultural Land promotes the conservation of soil resources, both of which will protect and increase carbon capture and storage functions. Enhanced carbon storage can help to mitigate anthropogenic climate change.</p>

9.4 Residual effects on climatic factors

9.4.1 The Local Plan sets out several policies which aim to help mitigate the adverse impacts relating to climatic factors (see **Box 9.2**). However, the implementation of these requirements would not be expected to fully mitigate the adverse impacts associated with net increases in GHGs. Box 9.3 lists the likely residual effects of the Plan in relation to climatic factors.

Box 9.3: Residual effects for climatic factors

Residual effects	Further details of the residual effect
Increased GHG emissions	<p>The proposed development of 8,000 dwellings and 63ha of employment floorspace over the Plan period would be likely to increase to some extent local carbon emissions. Energy demand will be expected to increase in the Plan area alongside increased congestion and transport related emissions.</p> <p>Although the policies within Box 9.2 will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design and low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the Plan.</p> <p>An increase in GHG emissions as a consequence of the proposed development is expected to be a long-term and permanent significant effect.</p>
Loss of multi-functional green infrastructure	<p>Various Local Plan policies aim to conserve and enhance multi-functional green and blue infrastructure across the borough, encouraging development proposals to incorporate GI and increase connectivity of the wider GI network.</p> <p>Furthermore, the Local Plan policies recognise the multi-functional benefits of GI in regard to ecosystem services and ensure development proposals are maximising opportunity to implement GI into developments.</p> <p>The Plan will result in the loss of greenfield land and associated GI to some extent, however LP policies will ensure mitigation is in place reduce the loss of GI and protect the wider GI network. A positive effect on provision of GI in the longer term is expected.</p>

10 Cultural heritage

10.1 Baseline

Designated features

- 10.1.1 The borough has a wide range of designated statutory and non-statutory heritage assets, including Listed Buildings, Registered Parks and Gardens (RPGs), Scheduled Monuments (SMs), conservation areas and (see **Figure 10.1**). These important heritage assets are protected through the planning system via conditions imposed on developers and other mechanisms.
- 10.1.2 Local authorities designate conservation areas in any area of 'special architectural or historic interest' whose character or appearance is worth conserving or enhancing. This is judged against local and regional criteria rather than national importance as is the case with listing. Conservation area designations increase the planning authority's control over demolition of buildings and over certain alterations to residential properties that would normally be classed as 'permitted development' and not require planning permission. There are 21 conservation areas located in Newcastle-under-Lyme⁹⁴.
- 10.1.3 Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the listed buildings, SMs, conservation areas, wreck sites and RPGs in England deemed to be 'at risk'. In Newcastle-under-Lyme, this includes two heritage assets⁹⁵:
- Model farm complex south west of Betley Old Hall, Main Street, Betley – Listed Building Grade II*.
 - Gatehouse, walls and bollards to Maer Hall, Maer – Listed Building Grade II*.

Non-designated features

- 10.1.4 It should be noted that not all the borough's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis by many people – whether at home, work or leisure. Whilst not listed, many buildings and other features are of historic interest. Likewise, not all nationally important archaeological remains are scheduled. There may be unrecorded archaeological artefacts in the area, which have not yet been discovered.
- 10.1.5 The Archaeology Data Service shows 2,438 records of physical archaeological evidence in the county of Staffordshire⁹⁶. This includes records of known features as well as digs and excavations, some of which resulted in archaeological finds.

⁹⁴ Newcastle-under-Lyme Borough Council (2024) List of conservation areas. Available at: <https://www.newcastle-staffs.gov.uk/conservation-heritage/conservation-areas> [Date accessed: 23/01/24]

⁹⁵ Historic England (2023) Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?q=Newcastle-under-Lyme%20&searchtype=harsearch> [Date accessed: 23/01/24]

⁹⁶ Archaeology Data Service (2016) ARCHSEARCH. Available at: <https://archaeologydataservice.ac.uk/archsearch/browser.xhtml> [Date accessed: 03/07/24]

- 10.1.6 Maintaining local distinctiveness, character and sense of place alongside delivering development can present challenges. However, new development can also stimulate new investment and potentially enhance the local townscape or improve the accessibility of heritage assets for local residents. Historic England advocate seeking opportunities alongside development for delivering heritage-led regeneration⁹⁷, creating a strong sense of place and local distinctiveness, encouraging the use of traditional building skills, and promoting climate change resilience and innovative reuse of historic buildings where appropriate⁹⁸. Engaging with and celebrating cultural heritage also provides a number of opportunities to benefit wellbeing, social inclusion and equality⁹⁹.
- 10.1.7 Heritage assets are predominantly considered under SA Objective 7 'Cultural Heritage', which seeks to enhance, conserve and manage sites, features and areas of historic and cultural importance.

⁹⁷ Deloitte (2017) Heritage Works: A toolkit of best practice in heritage regeneration. Available at: <https://historicengland.org.uk/images-books/publications/heritage-works/> [Date accessed: 03/07/24]

⁹⁸ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment – Historic England Advice Note 8. Available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> [Date accessed: 04/07/24]

⁹⁹ Historic England (2018) Wellbeing and the Historic Environment. Available at: <https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/wellbeing-and-historic-environment/> [Date accessed: 04/07/24]

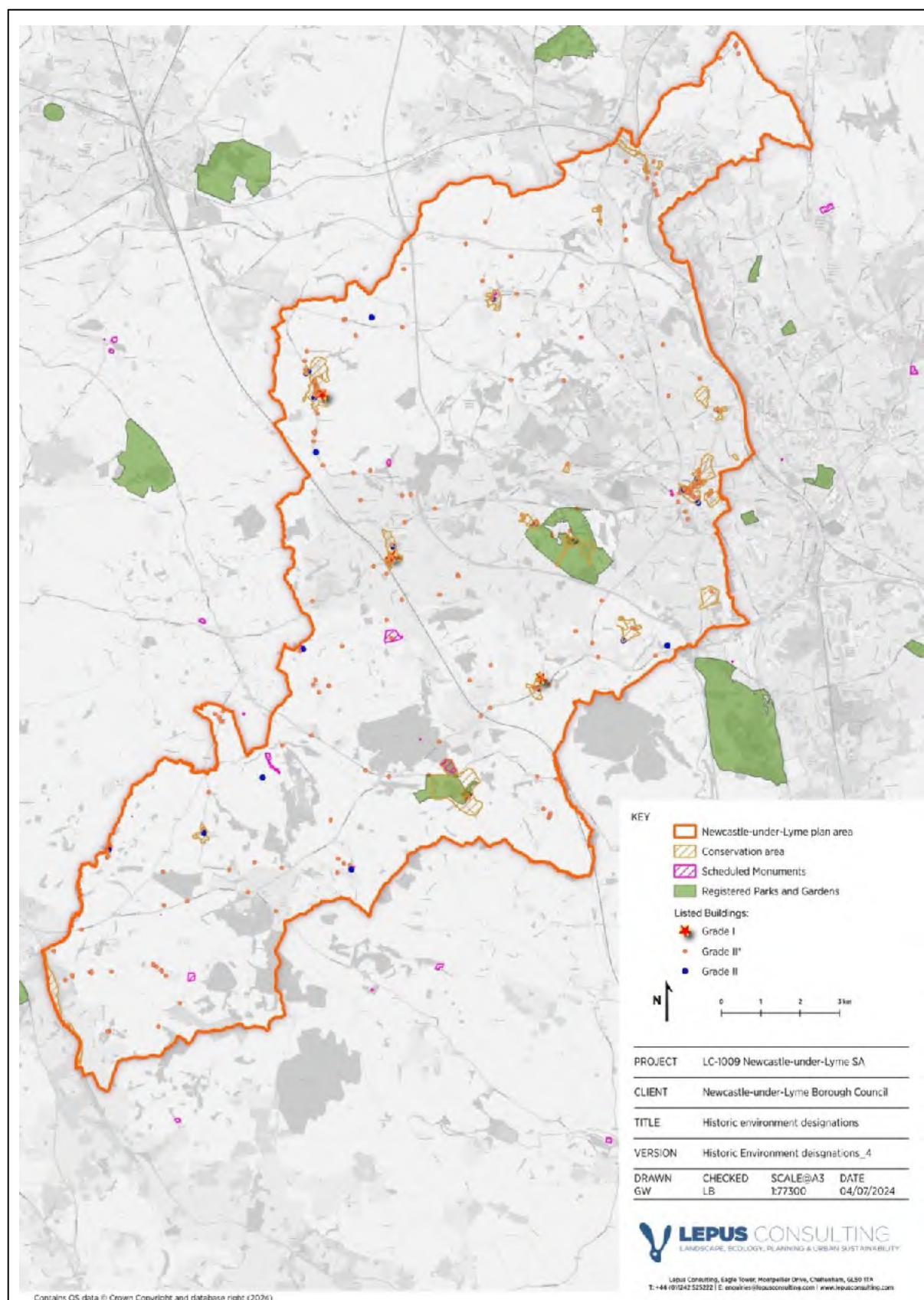


Figure 10.1: Historic environment designations in Newcastle-under-Lyme


Key issues relating to cultural heritage


- ⇒ The borough supports a range of heritage assets including listed buildings, conservation areas, scheduled monuments and registered parks and gardens.
- ⇒ Development in the borough may have the potential to lead to effects on historic landscapes and cause direct damage to archaeological sites, monuments, and buildings and / or their settings.
- ⇒ Archaeological remains, both seen and unseen, could potentially be affected by new development.

10.2 Impacts on cultural heritage

10.2.1 **Box 10.1** presents a plan-wide summary of the adverse impacts on cultural heritage that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations and for cultural heritage relate primarily to the alteration of historic character and setting associated with designated heritage assets.

Box 10.1: Summary of identified impacts on cultural heritage


Impact on cultural heritage	Summary of identified impact
 <p>Alter character and/or setting of designated heritage assets</p>	<p>Registered Parks and Gardens (RPGs) are designated heritage assets which LPAs must consider within in their decision-making processes. Development in close proximity to an RPG has the potential to affect both the asset itself and its setting.</p> <p>One allocated site, Site KL13, partially coincides with Keele Hall RPG and has the potential to cause significant effects to the RPG and its setting.</p> <p>One allocated site, Site TB19, is located adjacent to Keele Hall. A further seven allocated sites are identified as being located near to an RPG with the potential to adversely impact its setting.</p> <p>Development which coincides with or is located in close proximity to a Listed Building has the potential to affect both the asset itself and its setting. This will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets, including its setting. Grade I and II* Listed Buildings are considered to be those of greatest historic or architectural significance.</p> <p>No allocated sites coincide with Listed Buildings. However, Site TC45 is located directly adjacent to Grade II Listed Building 'Old Bulls Head Inn' and seven further allocated sites (MD29, SP11(1), SP11(2), TK10, TK17, TC7 and TC50) are located within close proximity to Grade II Listed Buildings with the potential to adversely impact their settings.</p> <p>No allocated sites have been identified to lead to adverse effects on Scheduled Monuments (SMs).</p>


Impact on cultural heritage	Summary of identified impact
 <p>Alter character and/or setting of Conservation Areas</p>	<p>Conservation Areas (CAs) are identified as areas of architectural or historic interest and designated at a local level. The SA adopts a precautionary approach to the assessment by presuming that development within or in proximity to a CA has the potential to adversely impact the heritage asset and its setting. It is however acknowledged that the replacement of buildings which currently have a detrimental impact on a CA could potentially result in a neutral, mixed or beneficial effect (to be informed by published Conservation Area Appraisals and site assessments).</p> <p>Two of the allocated sites are located wholly within a CA: Site TC45 and TC71 both lie within 'Newcastle Town Centre' CA; development at these two sites will have potential to affect the character of the CA. Four allocated sites (KL13, TK10, TK27 and TC7) are located adjacent to a CA and ten allocated sites are located in close proximity to CAs, all of which would have the potential to affect the setting of the CAs.</p>

10.3 Local Plan mitigation

- 10.3.1 The Local Plan includes an over-arching aim to maintain and enhance the natural and historic environment and preserve the local distinctiveness of settlements within Newcastle-under-Lyme. The policies anticipated to help protect and enhance the historic environment and heritage assets are listed in **Box 10.2**.

Box 10.2: Mitigating effects of the Local Plan policies on cultural heritage

Policy mitigation for cultural heritage	Summary of mitigating effect
 <p>Alter character and / or setting of designated heritage assets</p>	<p>Policy PSD7: Design guides the design of new developments, ensuring that schemes are in accordance with the National Design Code as well as any local design codes or guidance. Effective design codes can help to ensure new developments are integrated into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets.</p> <p>Policy SE9: Historic Environment sets out the requirement for development proposals to avoid harm to designated and non-designated assets, seeking to "conserve and, where possible, enhance the significance of all heritage assets and their settings". The policy will ensure Heritage Assessments are carried out where there is potential for adverse effects to occur, and encourages opportunities to better reveal the significance of heritage assets, and respect and enhance significant views.</p> <p>Policy SE10: Landscape will be likely to conserve and enhance local landscape features, including elements of the historic environment through ensuring development is guided by the Landscape and Settlement Character Assessment (LSCA) and Landscape Strategy.</p> <p>Policy CRE1: Climate Change encourages retrofitting historic buildings with measures to mitigate and adapt to climate change, where appropriate, which could help to improve the energy efficiency of historic buildings and encourage the conservation and renewal of cultural heritage assets.</p> <p>Various site policies require a Heritage Impact Assessment (HIA) to be conducted where there are designated heritage assets coinciding or located</p>

Policy mitigation for cultural heritage	Summary of mitigating effect
	in close proximity to proposed development, to conserve and enhance heritage assets and their settings.
 <p>Alter character and / or setting of conservation areas</p>	<p>Policy PSD7: Design guides the design of new developments, ensuring that schemes are in accordance with the National Design Code as well as any local design codes or guidance. Effective design codes can help to ensure new developments are integrated into the local landscape, reinforcing local distinctiveness and conserving conservation areas and their settings.</p> <p>Policy SE9: Historic Environment sets out the requirement for development proposals to avoid harm to designated and non-designated assets, seeking to “<i>conserve and, where possible, enhance the significance of all heritage assets and their settings</i>”. Heritage Assessments will be carried out where there is potential for adverse effects and pursue opportunities to better reveal the significance of conservation areas.</p> <p>Policy SE10: Landscape will be likely to conserve and enhance local landscape features, including the settings of conservation areas through ensuring development is guided by the LSCA and Landscape Strategy.</p> <p>Various site policies require a Heritage Impact Assessment (HIA) to be conducted where there are CAs coinciding or located in close proximity to proposed development, to ensure the design of new development is integrated into the setting of the CA.</p>

10.4 Residual effects on cultural heritage

- 10.4.1 The Local Plan policies seek to mitigate potential adverse impacts on heritage assets due to the proposed development, as well as protect and enhance the intrinsic rural character and local distinctiveness of Newcastle-under-Lyme, including the historic environment. The residual effects of the proposed allocations on heritage assets are discussed in **Box 10.3**.

Box 10.3: Residual effects for cultural heritage

Residual effects	Further details of the residual effect
Impact on heritage assets and / or setting	<p>The Local Plan policies, primarily Policy SD7 and SE9 will likely mitigate potential adverse impacts on heritage assets which may occur as a result of the development proposed within the Plan, including impacts on listed buildings, conservation areas, RPGs and their settings.</p> <p>Adverse impacts on the settings of heritage assets will likely be mitigated through Local Plan policies, primarily Policies SD7, SE9 and SE10.</p> <p>A range of legislation, the NPPF and published national and local guidance also affords protection to heritage assets in line with their significance.</p> <p>The Local Plan will be expected to mitigate the potential for significant impacts on the designated heritage assets arising from the proposed development sites, and a negligible impact is predicted overall.</p>

11 Human health

11.1 Baseline

- 11.1.1 The health and wellbeing of residents in Newcastle-under-Lyme is generally very good, with the borough performing better than the regional and national average for several key health indicators (see **Table 11.1**).
- 11.1.2 Given the age profile in the borough (see **Chapter 13**), Newcastle-under-Lyme may be expected to have a relatively high rate of chronic or life-limiting illnesses. The value of all-cause mortality for under 75-year-olds is 424.2, which is 17% higher than the national average of 363.4.

Table 11.1: Health statistics for Newcastle-under-Lyme in comparison with the national average¹⁰⁰

	Deprivation score (IMD) (2019)	Male life expectancy (yrs)	Female life expectancy (yrs)	Suicide rate (per 100,000)	Physically active adults (%)	Adults overweight/obese (%)
Newcastle-under-Lyme	18.9	78.5	82.3	12.1	62.2	63.8
West Midlands Region	25.3	78.5	82.5	10.3	63.4	67.2
England	21.7	79.4	83.1	10.7	67.3	63.8

- 11.1.3 Obesity is something of an issue in the borough, with 27% of children aged 10-11 years classed as obese, compared with the national average of 22.7%. Moreover, 37.8% of the borough's adults are physically inactive which is similar to the national average, with around 63.8% of the borough's adults with excess weight.

Healthcare facilities

- 11.1.4 Access to GP surgeries and hospitals is important for residents' health. Where distances to important healthcare services are long, sustainable transport modes such as frequent and affordable bus routes should be available to residents.
- 11.1.5 There are no hospitals located within the borough and residents therefore rely on services in neighbouring areas. The nearest hospitals providing an Accident and Emergency (A&E) department include the Royal Stoke University Hospital, located adjacent to the eastern boundary of the borough and Congleton War Memorial Hospital and Leighton Hospital to the north of the borough. Ideally, residents should be within 5km of a hospital¹⁰¹.

¹⁰⁰ ONS (2021) Life expectancies: Data and analysis from Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/lifeexpectancies>. [Date accessed: 05/07/24]

¹⁰¹ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

- 11.1.6 There are GP surgeries and medical practices throughout the borough, including those in Kidsgrove, Audley, Newcastle-under-Lyme town and elsewhere. Generally, it is considered that being within 800m or a ten-minute walk of a GP surgery would constitute having good access to your GP¹⁰². Whilst there are a large number of GP surgeries throughout the borough, given the rural nature of the local area and the dispersed pattern of settlements, new residents could potentially have relatively limited access to GP facilities.
- 11.1.7 New housing developments are likely to increase demand for local healthcare services¹⁰³. The government provides guidance for general practice capacity for large scale developments¹⁰⁴ as well as resources for planning and designing healthier places¹⁰⁵.

Greenspaces and natural habitats

- 11.1.8 In line with the NPPF, LPAs should seek to promote social interaction, create communities which are safe and accessible, and ensure there is good accessibility to a range of GI, sports facilities, local shops, cultural buildings and outdoor space.
- 11.1.9 Within Newcastle-under-Lyme, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRoW and cycle networks. There are five district parks¹⁰⁶: Brampton Park, Lyme Valley, Wolstanton Marsh, Wye Road, and Bathpool, and 20 neighbourhood parks¹⁰⁷. The borough also includes green corridors and green routes, including Newcastle Greenway, Kidsgrove Greenway, three parks, and Lymebrook Greenway.
- 11.1.10 These open spaces positively contribute towards the health and wellbeing of residents, by helping to encourage physical exercise through sports, recreation and active travel. The recreational green spaces combined with the natural green space network also benefit the mental health and wellbeing of residents. The Newcastle-under-Lyme Open Space Strategy¹⁰⁸ identifies open space as 'good' to 'very good' quality throughout the borough. However, access to open space tends to be more limited in the rural south of the borough, the urban-north sub-area and the fringes of the borough. In these locations, there are deficiencies of amenity greenspace, parks and gardens, provision for young people, and allotments.

¹⁰² Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

¹⁰³ Solutions for Public Health (2022) Healthcare demand arising from new housing developments. Available at: <https://www.sph.nhs.uk/case-studies/healthcare-demand-arising-new-housing-developments/> [Date accessed: 03/07/24]

¹⁰⁴ UK Parliament (2022) General practice capacity for large-scale housing developments. Available at: <https://commonslibrary.parliament.uk/research-briefings/cdp-2022-0067/> [Date accessed: 03/07/24]

¹⁰⁵ Public Health England (2017) Spatial Planning for Health: An evidence resource for planning and designing healthier places. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf [Date accessed: 03/07/24]

¹⁰⁶ Newcastle-under-Lyme Borough Council (2024). Parks and open spaces. Available at: <https://www.newcastle-staffs.gov.uk/borough-maintenance/parks-open-spaces/2> [Date accessed: 09/02/24]

¹⁰⁷ Ibid.

¹⁰⁸ Newcastle-under-Lyme Borough Council (2021). Open Space and Green Infrastructure Strategy. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/1440/report> [Date accessed: 22/01/24]

Air pollution

- 11.1.11 As discussed in **Chapter 7**, air pollution is a significant concern internationally, nationally and locally, with 5.5% of mortality in England and an average of 5.0% of mortality in Newcastle-under-Lyme Borough being attributable to particulate air pollution in 2021¹⁰⁹.
- 11.1.12 It is assumed that the impacts of road transport-associated air pollution primarily occur within 200m of source¹¹⁰. AQMAs have been designated to manage local air quality in areas where National Air Quality Objectives are unlikely to be achieved. Residents within 200m of a road or AQMA may therefore expect to have their health adversely impacted by road transport-associated air pollution to some extent, in addition to the potential impacts of road transport-associated noise and light pollution.
- 11.1.13 The issue of human health is dealt with under SA Objective 9 'Health and Wellbeing'. Indicators for the objective include the proximity and access to GP surgeries, NHS hospitals and natural greenspaces.

Key issues relating to human health

- ⇒ According to data from the year ending September 2023, there has been an annual increase in some types of crime including violence involving a knife, violence against a person, violence without injury, stalking and harassment, and public disorder offences.
- ⇒ Hospital admissions for intentional self-harm are significantly higher in the borough compared to the West Midlands and England.
- ⇒ The borough has a higher occurrence of diseases and health-related issues when compared to England and the West Midlands, including obesity, diabetes, cardiovascular disease and liver disease.
- ⇒ There is a need for new open space to accompany new development, to ensure that the open space provision keeps pace with population growth.




11.2 Impacts on human health


- 11.2.1 **Box 11.1** presents a plan-wide summary of the adverse impacts on human health that have been identified through the SA process. These adverse impacts have been identified prior to considering opportunities for mitigation.

¹⁰⁹ Office for Health Improvement and Disparities (2023) Public Health Profiles: Fraction of mortality attributable to particulate air pollution (new method). Available at: <https://fingertips.phe.org.uk/search/air%20pollution#page/4/gid/1/pat/15/par/E92000001/ati/401/are/E07000195/iid/93861/age/230/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1/page-options/tre-do-1> [Date accessed: 22/01/24]

¹¹⁰ Department for Transport (2021) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 03/07/24]

Box 11.1: Summary of identified impacts on human health


Impact on human health	Summary of identified impact
 <p>Sustainable access to healthcare / leisure facilities</p>	<p>Newcastle-under-Lyme is a largely rural borough, with sparse settlements. There are no NHS hospitals providing an A&E service within the borough, and healthcare and leisure facilities are generally restricted to the larger settlement centres meaning that a large proportion of the proposed growth will be located outside of the identified sustainable target distances to these facilities. Where there is more limited access to these facilities, residents may be discouraged from living active and healthy lifestyles, which could potentially have adverse impacts on mental wellbeing as well as physical health.</p> <p>Some 22 allocated sites are located outside of the 5km sustainable target distance to NHS hospitals providing an A&E service.</p> <p>Some 19 allocated sites are located outside of the 800m sustainable target distance to GP surgeries.</p> <p>Some 46 allocated sites are located outside of the 1.2km sustainable target distance to leisure centres.</p>
 <p>Exposure to air / noise pollution (from AQMAs / main roads)</p>	<p>The long-term health of residents, in particular vulnerable groups including children and the elderly, could be adversely affected by local reductions in air quality. This impact is discussed further in Chapter 7.</p> <p>Development within 200m of an AQMA or main road could potentially expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health.</p> <p>At the time of assessment, 13 allocated sites were identified to be located within, or within 200m of, an AQMA. This includes nine sites coinciding or being located within 200m of 'Newcastle-under-Lyme Number 2' AQMA, two sites located within 200m of 'Stoke-on-Trent' AQMA, and two sites located within 200m of 'Kingsgrove' AQMA.</p> <p>Some 30 allocated sites are located within 200m of a main road, raising the potential for air quality impacts associated with atmospheric pollution from vehicular traffic at these sites.</p>
 <p>Limited access to public greenspace</p>	<p>Good access to public green or open spaces, a diverse range of natural habitats and travelling via walking and cycling are known to have physical and mental health benefits. Whilst there is generally good access to open space across Newcastle-under-Lyme as a whole, there are spatial variations on existing access to different types and sizes of open space across different areas.</p> <p>Four site allocations coincide with existing greenspaces (HD10, CH3, CH13 and SP11(4)), and have potential to result in a net loss of green space, and one site (KS17) is uncertain as to whether it coincides with existing greenspace. In terms of accessibility to greenspaces, the majority of the site allocations would be expected to locate new resident in areas with good access to the surrounding countryside or public greenspaces. However, two allocated sites (MD29 and LW74) are located away from identified greenspaces and could potentially restrict the access of new residents to opportunities for open air recreation and exercise.</p>

Impact on human health	Summary of identified impact
 <p>Limited access to PRow or cycle network</p>	<p>The majority of allocated sites are located in areas with good coverage by the PRow, pedestrian and/or cycle networks, providing many site end users with opportunities for active travel and recreation in the countryside. However, eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use.</p>


11.3 Local Plan mitigation

- 11.3.1 Several policies aim to promote healthy and active lifestyles for new and existing residents within the Plan area. Many of these policies would be expected to result in benefits to human health, through the provision of open spaces, improvements to walking and cycling networks and improved sustainable transport and access to healthcare facilities. Mitigation is discussed further in **Box 11.2**.

Box 11.2: Mitigating effects of the Local Plan policies on human health

Policy mitigation for human health	Summary of mitigating effect
 <p>Sustainable access to healthcare / leisure facilities and services</p>	<p>Policy PSD6: Health and Wellbeing sets out the Council's intention to support healthy and active lifestyles, supporting the aims of the Staffordshire Joint Wellbeing Strategy, addressing health inequalities and providing access to leisure and healthcare services. The policy will ensure no unnecessary loss of open space or GI/BI resources as identified in the Open Space and Green Infrastructure Strategy.</p> <p>Policy SE6: Open Space, Sports and Leisure Provision and various site policies will help to ensure that local residents have access to open spaces, sports and leisure facilities and that the provision, enhancement and maintenance of such services is catered for to meet the local demand. Loss of green/open spaces will only be permitted where it is demonstrated that these are surplus to requirements or will be replaced by equal or enhanced provision.</p> <p>Policy IN1: Infrastructure will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, which includes healthcare facilities. This is supported by a number of site policies, which require to developers to make financial contributions to the capacity of local health facilities.</p> <p>Policy IN2: Transport and Accessibility and numerous site policies seek to promote sustainable transport and promote improved connectivity to local services (including healthcare facilities) through a range of criteria for new development proposals.</p> <p>Policies PSD2: Settlement Hierarchy and PSD3: Distribution of Development will ensure that new housing development is delivered in accordance with the provision of and accessibility to key services, including healthcare and leisure facilities, with development being centred towards areas with higher capacity.</p>

Policy mitigation for human health	Summary of mitigating effect
 <p>Exposure to air / noise pollution (from AQMA/ main road)</p>	<p>Policy SE1: Pollution and Air Quality states that “<i>development proposals that are likely to result in detrimental impacts on pollution, including on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts</i>”. The policy will ensure that the development will not worsen air quality within AQMAs and will consider the cumulative effects of emissions from proposed developments.</p> <p>Policy CRE1: Climate Change will encourage new developments to incorporate measures to improve energy efficiency and is likely to help reduce the demand for energy, potentially leading to lower emissions of air pollutants during construction and occupation of development. Furthermore, the policy requires developments to incorporate GI and BI, seeking opportunities to enhance ecosystem services such as carbon sequestration and air filtration, with further possible benefits for air quality.</p> <p>Policy CRE2: Renewable Energy promotes alternate renewable and low carbon technologies that can contribute towards reduced emissions of pollutants and improved air quality.</p> <p>Policy IN2: Transport and Accessibility seeks to promote sustainable transport and promote improved connectivity to local services in order to reduce reliance on less sustainable means of transport.</p> <p>Policies RET4: Newcastle-under-Lyme Town Centre and RET5: Kidsgrove Town Centre promote sustainable and active travel initiatives, which could result in improvements to air quality due to reduced reliance on private car use and consequently lower emissions of associated air pollutants.</p> <p>Various site policies set out requirements for an air quality assessment and mitigation strategy to be conducted at multiple sites in proximity to AQMAs or main roads, which is likely to help ensure the construction and occupation of new development avoids residents being exposed to a decline in air quality.</p>
 <p>Limited access to public greenspace</p>	<p>Policy SE6: Open Space, Sports and Leisure Provision and various site policies will help to ensure that local residents have access to open spaces, sports and leisure facilities and that the provision, enhancement and maintenance of such services is catered for to meet the local demand. Loss of green/open spaces will only be permitted where it is demonstrated that these are surplus to requirements or will be replaced by equal or enhanced provision.</p> <p>Policies PSD7: Design, SE14: Green and Blue Infrastructure, SE8: Biodiversity and Geodiversity and SA1: General Requirements include provisions to enhance the provision and connectivity of GI/BI, and provide opportunities for local residents to access greenspace and nature provision.</p>

Policy mitigation for human health	Summary of mitigating effect
 <p>Limited access to PRow or cycle network</p>	<p>Policy IN4: Cycleways, Bridleways and Public Rights of Way and various site policies will ensure appropriate design and layout of cycleways, bridleways and PRow and supports development that will improve the number and quality of opportunities for walking, cycling and riding.</p> <p>Policies PSD6: Health and Wellbeing, SE14: Green and Blue Infrastructure, PSD7: Design and various site policies aim to ensure that development proposals provide good access, including via active travel, which may help to encourage active lifestyles and increase the uptake of cycling and walking, through the provision of safe and accessible routes.</p>

11.4 Residual effects on human health

- 11.4.1 Many of the policies would be expected to mitigate and result in positive impacts in relations to community cohesion, healthy lifestyle and access to healthcare facilities. Residual positive and negative effects of the Local Plan on human health are discussed in Box 11.3.

Box 11.3: Residual effects for human health

Residual effects	Further details of the residual effect
Limited sustainable access to healthcare/leisure facilities and services	<p>A number of site allocations are located outside of the sustainable target distance to an NHS hospital and GP surgery. Local Plan policies, such as Policies PSD6 and IN1, would be likely to help prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents; however, the policies would not be expected to fully mitigate the restricted access to healthcare services for sites in more rural settlements in Newcastle-under-Lyme.</p> <p>Limited sustainable access to healthcare facilities would be expected to be a medium-term and temporary significant effect.</p>
Exposure to air/noise pollution (from AQMA/main road)	<p>Local Plan policies would be expected to reduce adverse impacts associated with the exposure of site end users to poor air quality within or adjacent to AQMAs, and impacts associated with reduced air and noise quality alongside main roads.</p> <p>The policies are expected to prevent unacceptable impacts on human health associated with air pollution but may lead to a cumulative adverse effect on air quality as a whole, which the policies in the Plan in itself cannot fully mitigate as it would require other transport interventions, for example the introduction of car-free zones.</p> <p>Adverse impacts on human health resulting from exposure to poor air quality and noise pollution across the Plan area would be expected to be a long-term but potentially temporary significant effect.</p>
Access to public greenspace	<p>Various Local Plan policies, as discussed within Box 11.2, seek to provide a range of open spaces, sports facilities and recreational spaces for site end users and compensate for any lost facilities, which will be expected to facilitate healthy and active lifestyles and supplement the borough's existing recreational resource. An overall positive effect is likely with regard to the provision of and access to green spaces.</p>

Residual effects	Further details of the residual effect
Access to PRow or cycle network	A large number of allocated sites are located adjacent to existing pedestrian routes or cycle paths. Various Local Plan policies seek to create permeable neighbourhoods and promote cycling and walking which would be likely to improve the coverage of, and accessibility to, the pedestrian and cycle networks across Newcastle-under-Lyme. This is expected to encourage residents to participate in physical exercise and active travel. An overall positive effect would be likely with regard to pedestrian and cycle access.

12 Landscape

12.1 Baseline

Landscape character

- 12.1.1 Landscape can be described as comprising natural, cultural, social, aesthetic and perceptual elements, this includes flora, fauna, soils, land use, settlement, sight, smells and sound¹¹¹. Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside.
- 12.1.2 Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs), defined by a unique combination of landscape, biodiversity, geodiversity, history and cultural and economic activity. Newcastle-under-Lyme falls within two NCAs:
- Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production;
 - The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.
- 12.1.3 Newcastle-under-Lyme is dominated by seven landscape character types (LCT) according to the Newcastle-under-Lyme Landscape and Settlement Character Assessment Study: Part 1¹¹² (see **Table 12.1**).

Table 12.1: Landscape character types of Newcastle-under-Lyme¹¹³

Landscape Character Type	Key features
Gritstone Uplands	The Gritstone Uplands LCT is a strongly undulating, upland landscape, characterised by rocky outcrops of gritstone and the folly on the hill at Mow Cop, at the northern extent of the Study Area, continuing north into the Staffordshire Moorlands District and Cheshire.
Coalfield Farmlands	The Coalfield Farmlands LCT is an undulating and elevated landscape that extends north through the Study Area, from the north-west edge of Newcastle-under-Lyme urban area and across the boundary into Cheshire and Staffordshire Moorlands.
Ancient Redland Farmlands	The Ancient Redland Farmlands LCT is a strongly undulating ancient rural landscape with distinctive deep red soils to the south-west of Newcastle-under-Lyme.

¹¹¹ Natural England (2014) An Approach to Landscape Character Assessment. Available at: <https://www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types> [Date accessed: 03/07/24]

¹¹² Newcastle-under-Lyme Borough Council (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Part 1 Landscape & Settlement Character Assessment. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/1065/lca-part-1> [Date accessed: 22/01/24]

¹¹³ Ibid.

Landscape Character Type	Key features
Ancient Clay Farmlands	The Ancient Clay Farmlands LCT is a gently rolling lowland pastoral landscape in the north- west of the Study Area and extending west into Cheshire characterised by a well-defined, irregular field pattern bounded by ancient hedgerows, with scattered oak trees.
Sandstone Hills and Farmlands	The Sandstone Hills & Farmlands LCT in the south of the Study Area is characterised by a pattern of large arable fields and large plantation woodlands located on distinctive undulating, rounded hills, interspersed by more intimate pastoral fields on steeper slopes.
Ancient Sandstone Farmlands	The Ancient Sandstone Farmlands LCT are a gently undulating, sparsely settled, lowland productive rural landscape in the south-west of the Study Area, extending west into Shropshire.
River Valley	The River Valley LCT is a valley landform with steep slopes containing a meandering river and an associated green corridor within the urban area of Newcastle-under-Lyme/Stoke-on-Trent.

Green Belt

- 12.1.4 The Newcastle-under-Lyme Green Belt forms part of the Stoke-on-Trent Green Belt and covers the entire northern half of the authority area (**Figure 12.1**). It is contiguous with Green Belt in Cheshire East Council to the north and Stafford Borough Council to the south. Although the Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks.
- 12.1.5 A Green Belt Assessment has been undertaken to inform the consideration of revisions to Green Belt boundaries in the borough. In Stage 1, the Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt (as set out in the NPPF)¹¹⁴. In Stage 2, a site review methodology has been prepared, and assessments have been completed for potential development sites which are located within the Green Belt¹¹⁵. Stage 3 of the assessment includes advice on safeguarded land, compensatory improvements, and exceptional circumstances, plus additional Green Belt site assessments¹¹⁶.
- 12.1.6 The latest Green Belt Site Review (2024)¹¹⁷ consolidates all of the previous Green Belt site review assessments which have been completed at the various stages after the publication of the Part 1 Green Belt Assessment in November 2017. The 2024 report also sets out the assessment of new sites, previously assessed sites with revised boundaries / where circumstances have changed.

¹¹⁴ Arup (2017) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment, November 2017. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/01/24]

¹¹⁵ Arup (2020). Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment Part 2 Study, December 2020. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/01/24]

¹¹⁶ Arup (2023) Newcastle-under-Lyme Borough Council Green Belt Review Part 3, June 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/01/24]

¹¹⁷ Arup (2024) Newcastle-under-Lyme Council Green Belt Site Review: Consolidated Report. Draft, 13 May 2024.

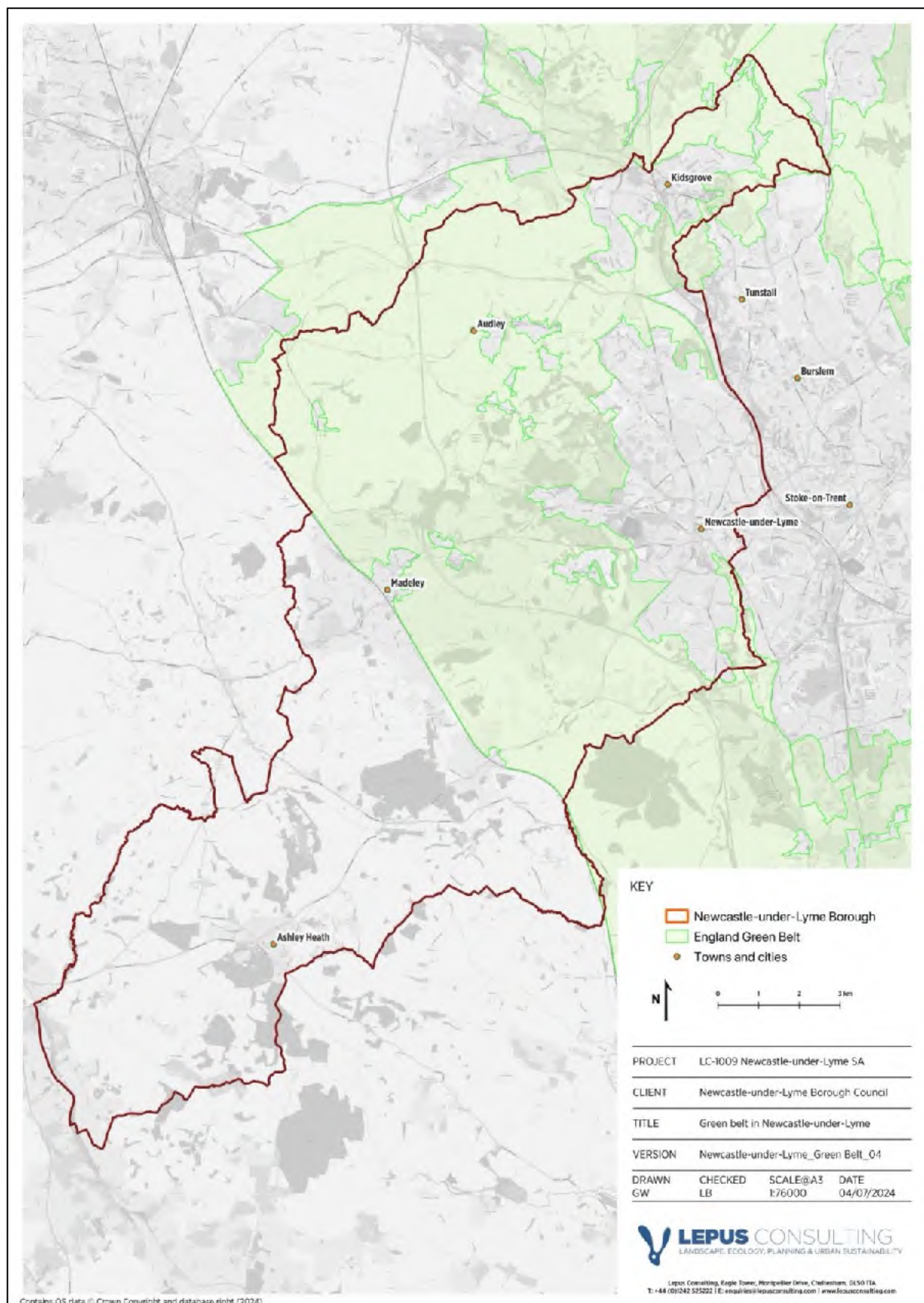


Figure 12.1: Green Belt boundaries in Newcastle-under-Lyme

Landscape sensitivity

- 12.1.7 Alongside the Green Belt Study, the Newcastle-under-Lyme Landscape and Settlement Character Assessment (LSCA) Study¹¹⁸ provides a site-specific landscape and visual appraisal (LVA) for potential development sites proposed within the Plan. The LVA provides a high-level assessment of each site, to identify place-specific landscape and visual sensitivity issues that may be constraints or opportunities for development, informed by the LSCA Study (2022) and supplemented by targeted field surveys. Some 23 sites, including three strategic sites and 20 smaller sites, have been evaluated.
- 12.1.8 In addition, new development could potentially increase noise and light pollution and reduce the perception of tranquility, which is of particular consideration in areas of landscape sensitivity.
- 12.1.9 Regeneration and development of brownfield sites within the built-up areas may present opportunities to improve the local character, however, the design and layout of potential development is unknown at present. Consideration of the potential impact of development on sensitive townscapes is considered in terms of the historic landscape character within **Chapter 10, Cultural Heritage**.
- 12.1.10 The issue of landscape has been primarily considered under SA Objective 8 'Landscape', which seeks to conserve, enhance and manage the character and appearance of the landscape, whilst maintaining and strengthening their distinctiveness.

Key issues relating to landscape



- ⇒ A large proportion of Green Belt is located in the north of the borough, of which large areas are identified to make moderate or strong contributions to the purposes of the Green Belt as set out in the NPPF.
- ⇒ The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington. There are areas of medium landscape sensitivity in the centre of the borough, within Madeley and High Lane.
- ⇒ Five Landscape Character Types have been identified in the borough. Their key features that contribute to their landscape character would need protection from adverse impacts associated with development. Tranquility, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.

¹¹⁸ CBA (2023). Landscape character study (part 3). Newcastle-under-Lyme Landscape and Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/629/landscape-character-study-part-3> [Date accessed: 24/01/24]

12.2 Impacts on landscape


12.2.1 **Box 12.1** presents a plan-wide summary of the adverse impacts on landscape that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 12.1: Summary of identified impacts on landscape

Impact on landscape	Summary of identified impact
 <p>Alteration of landscape character</p>	<p>The introduction of new built form can contradict and conflict with distinctive local character of existing landscapes and townscapes which can result in adverse impacts on the local character.</p> <p>A total of 18 site allocations are anticipated to have adverse effects on the distinctive characteristics of the various LCTs that lie across the Plan area. The majority of sites are located within 'Ancient Redland Farmlands', 'Ancient Clay Farmlands', 'Coalfield Farmlands' and 'Sandstone Hills and Farmlands', where arable pastureland and undulating rolling hills are often key characteristics.</p>
 <p>Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt</p>	<p>The Landscape and Settlement Character Assessment (LSCA) Study¹¹⁹ considered the landscape and visual aspects of land parcels using ten criteria which were considered most likely to be affected by development. Overall landscape sensitivity was assessed on a five-point scale, and this information was used to categorise sites into parcels of 'medium' or 'high' sensitivity.</p> <ul style="list-style-type: none"> • Areas of 'high' sensitivity are of <i>"high landscape value containing landscape components that are highly susceptible to the type of change being assessed"</i>, which affects 15 site allocations. • Areas of 'medium' sensitivity are of <i>"medium landscape value containing landscape components that have some susceptibility to the type of change being assessed"</i>, which affects 10 site allocations. • The remaining 29 allocated sites are located outside of the study area where a negligible effect on sensitive landscapes is likely. <p>The Green Belt Study¹²⁰ assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale.</p> <ul style="list-style-type: none"> • Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where <i>"the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt with detrimentally undermine this purpose"</i>. • 11 allocated sites are located in areas which make a 'moderate' overall contribution to the purposes of the Green Belt where <i>"the site contributes to a few of the elements of the Green Belt purpose however it does not fulfil all elements"</i>. • Four allocated sites (CT1, KL15, BL18 and TK17) are located in areas which make a 'weak' overall contribution to the purposes of

¹¹⁹ Ibid.


¹²⁰ Newcastle-under-Lyme Borough Council (2024). Green Belt Assessment Part 4. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]




Impact on landscape	Summary of identified impact
	<p>the Green Belt where <i>"the site makes a limited contribution to an element of the Green Belt purpose"</i>.</p> <ul style="list-style-type: none"> The remaining 37 allocated sites are located outside on the study area where a positive impact on the preservation of Green Belt purposes is likely.
 <p>Change in views from public rights of way</p>	<p>The development proposed in the Plan has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations. A total of 19 allocated sites coincide with, lie adjacent or lie in close proximity to, PRoW where there is potential for views to be altered.</p>
 <p>Increased risk of urbanisation of the countryside and coalescence</p>	<p>The proposed development at 19 allocated sites were identified as being likely to result in adverse impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the open countryside.</p> <p>The development at seven allocated sites could potentially lead to coalescence between settlements: CT1 (coalescence between Talke and Red Street), CH3 (Cross Heath and May Bank), KL13, KL15, SP11 (2), SP11 (3) and TB19 (Newcastle-under-Lyme, Silverdale and Keele).</p> <p>The risk of urban sprawl and coalescence between settlements has potential to reduce separation between settlements and result in loss of local identity and sense of place.</p>
 <p>Loss of tranquility</p>	<p>Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. Increased light pollution levels and consequent impacts on dark skies may arise as a consequence of the development proposed in the Plan. The introduction of both noise and night-time lighting is likely to reduce tranquility at these locations.</p>
 <p>Threats to important trees</p>	<p>Tree Preservation Orders (TPOs) are assigned to specific trees or groups of trees of which their retention is expedient in the interests of amenity of the local area. A TPO prohibits the damage or destruction of trees without the written consent of the local planning authority. A total of 12 sites coincide or lie adjacent to trees under TPOs where there is potential for adverse effects on these trees and their protected status to arise as a result of the proposed development, with further implications for the appearance and character of the local landscape.</p>



12.3 Local Plan mitigation

12.3.1 The spatial strategy for development in Newcastle-under-Lyme to 2040, as set out in the Local Plan, directs the majority of new development towards higher tier settlements and existing urban areas, in line with the settlement hierarchy. The Local Plan seeks to direct development towards previously developed land where possible. However, to meet the identified housing requirements, a proportion of growth within the Plan is located on previously undeveloped land. Various Local Plan policies aim to protect and, where appropriate, enhance the local character and distinctiveness of Newcastle-under-Lyme's landscape. These policies are discussed in **Box 12.2**.

Box 12.2: Mitigating effects of the Local Plan on landscape

Policy mitigation for landscape	Summary of mitigating effect
 <p>Threaten or result in the loss of rural and locally distinctive landscape character</p>	<p>Policy SE10: Landscape will ensure that development proposals are guided by the findings of the Landscape and Settlement Character Assessment (LCSA) and the Landscape Strategy, and includes measures to conserve and enhance the local landscape character and distinctiveness. Major developments will need to be accompanied by a Landscape and Visual Impact Assessment (LVIA).</p> <p>Policy SE9: Historic Environment will ensure development is informed by the Staffordshire Historic Landscape Characterisation and encourages opportunities for development proposals to enhance significant views.</p> <p>Policy PSD7: Design will guide the design of developments and ensure that schemes are in accordance with both the National Design Code as well as integrating local design codes, thereby protecting local landscape features and local identity.</p> <p>Policies RET1: Retail, RET4: Newcastle-under-Lyme Town Centre and RET5: Kidsgrove Town Centre include measures to ensure development aligns with surrounding landscape features and townscape character.</p> <p>Policy SA1: General Requirements promotes high design quality, incorporation of GI/BI and will ensure developments are informed by landscape appraisals where appropriate.</p> <p>Various site policies ensure that development is not intrusive to views through providing open space and GI provision, and SuDS implementation, which is likely to fragment urban form.</p>

Policy mitigation for landscape	Summary of mitigating effect
 <p>Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt</p>	<p>Policy PSD5 Green Belt will protect the retained Green Belt and its functions, including in preventing urban sprawl, which in turn can help to protect landscape character. The policy will ensure that development proposals for sites removed from the Green Belt deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.</p> <p>Policy SE10 Landscape will ensure that development proposals are guided by the findings of the LCSA and includes measures to conserve and enhance the local landscape character and distinctiveness, and ensuring developments identify and protect key views to landmark features. Major developments will need to be accompanied by an LVIA.</p> <p>Policy SA1 General Requirements sets out a range of compensatory improvements to the environmental quality and accessibility of the remaining Green Belt where sites are proposed to be released from the Green Belt; this includes new and enhanced GI, biodiversity improvements, landscape and visual enhancements, new walking routes and recreational provisions.</p>
 <p>Change in views from public rights of way</p>	<p>Policy PSD7 Design will guide the design of developments and ensure that schemes are in accordance with both the National Design Code as well as integrating local design codes, thereby protecting local landscape features and views.</p> <p>Policy SE10: Landscape includes measures to conserve and enhance the local landscape character and distinctiveness, and ensuring developments identify and protect key views to landmark features.</p> <p>Policy SE14 Green and Blue Infrastructure and various site policies include provisions to enhance the provision and connectivity of GI/BI, which will be likely to improve the appearance and character of the local landscape.</p> <p>Policy PSD4 Development Boundaries and the Open Countryside ensures development proposals will be supported where they are in keeping with the surrounding landscapes.</p>
 <p>Increased risk of urbanisation of the countryside and coalescence</p>	<p>Under Policy PSD4: Development Boundaries and the Open Countryside development proposals will be supported where they are in keeping with the surrounding landscape, role and scale of the settlement and therefore conserve and enhance landscape character.</p> <p>Policy PSD5: Green Belt and various site policies will protect the retained Green Belt and its functions, including in preventing urban sprawl, such as through forming buffers around the Green Belt where development will lie adjacent or coincide.</p> <p>Policy PSD7: Design will guide the design of developments and ensure that schemes are in accordance with both the National Design Code as well as integrating local design codes, thereby protecting local landscape features and local identity.</p>

Policy mitigation for landscape	Summary of mitigating effect
 <p>Loss of tranquility</p>	<p>Policy SE12: Amenity will ensure that noise and light pollution and environmental disturbances are considered within new developments, thereby helping to protect tranquility.</p>
 <p>Threats to important trees</p>	<p>Policy SE11: Trees, Hedgerows and Woodland and various site policies will ensure that trees are protected (or replaced where loss is unavoidable), and new trees planted, leading to an increase in overall canopy cover.</p> <p>Policy SE8: Biodiversity and Geodiversity seeks to protect trees and woodlands and the ecological networks related to their conservation and enhancement.</p>

12.4 Residual effects on landscape

The Local Plan sets out numerous policies which would be expected to help mitigate potential adverse impacts of the proposed development on the landscape, as set out in **Box 12.2**. Despite these policy provisions, the Local Plan would be expected to result in residual effects on the landscape to some extent, as discussed in **Box 12.3**.

Box 12.3: Residual effects for landscape

Residual effects	Further details of the residual effect
Alteration of landscape character	<p>Various Local Plan policies seek to ensure that development proposals maintain and improve the intrinsic rural character of the borough and distinctiveness and have regard to the findings of the published LSCA, as outlined in Box 12.2, which would be likely to mitigate adverse impacts arising from development proposals in some locations. However, due to the scale of development proposed, with a large proportion in previously undeveloped locations surrounding rural settlements, these policies are not expected to fully mitigate the potential impacts on landscape character across the borough and a residual adverse effect is anticipated.</p> <p>It should be noted that the nature of the effects of development on the landscape is highly dependent on local site circumstances and the nature of the development proposals.</p> <p>Alteration of the landscape character is a long-term and permanent significant effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan.</p>
Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt	<p>Local Plan policies seek to ensure that Green Belt land will only be released for development when necessary and justified. Various Local Plan policies aim to maintain and enhance Newcastle-under-Lyme's distinctive landscapes and ensure that the design of development responds to its surroundings.</p> <p>However, it is unlikely that adverse impacts could be fully mitigated particularly for sites allocated in areas identified as being of a 'high' or 'medium' sensitivity, or sites allocated in areas with a 'moderate' or 'strong' overall contribution to the purposes of the Green Belt. Within these areas, the landscape is unlikely to be able to accommodate new development without significant change.</p> <p>Alteration of sensitive landscapes is a long-term and permanent significant effect.</p>
Alteration of views	<p>Whilst the Local Plan policies provide some proportionate protection of visual amenity and views and may help to mitigate some of the adverse impacts in this regard, it is likely a residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of sites.</p> <p>Alteration of views is likely to be a long-term and permanent significant effect.</p>

Residual effects	Further details of the residual effect
Increase risk of urbanisation of the countryside and coalescence	<p>Various policies in the Local Plan, as set out in Box 12.2, seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts and a residual adverse effect is anticipated.</p> <p>An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant effect.</p>
Loss of tranquility	<p>The proposed development of 8,000 additional new dwellings and 63ha of new employment land, with a number of developments located within more rural areas, would be likely to result in a loss of tranquility of the rural landscape as a consequence of increases in noise and light pollution. Therefore, a residual adverse effect is anticipated.</p> <p>The loss of tranquility is a long-term and permanent significant effect.</p>
Threats to important trees	<p>Policies within the Local Plan will ensure that the majority of existing trees, in particular those with TPOs, are retained, conserved and enhanced. A residual negligible impact on important trees is expected.</p>

13 Population and material assets

13.1 Baseline

13.1.1 'Population' is a broad topic and has been addressed under several SA Objectives: 4 'Natural Resources and Waste', 9 'Health and Wellbeing', 10 'Equality', 11 'Transport and accessibility', 12 'Economy'. With respect to population, these objectives seek to create places where residents live a high quality of life for longer, are well educated and have the necessary skills to gain employment and succeed in modern society. Indicators include the proximity of development proposals to schools, accessibility to employment land and proximity to services and amenities.

13.1.2 'Material assets' covers a variety of built and natural assets which are accounted for in a range of SA Objectives. It is a requirement of Schedule 2 of the SEA Regulations to consider material assets, although they are not defined. The SA process has considered material assets as the health centres, schools and other essential infrastructure resources required to meet the demands of the local population and development aspirations of the Local Plan, in addition to natural assets such as mineral resources. Other aspects of natural assets, such as agricultural land, have been considered under other SEA topics (see **Chapter 14 – Soil**).

Population size

13.1.3 The borough's population was 123,300 in 2021¹²¹, which is set to increase. The population is getting older whilst the proportion of residents of working age is reducing, which could have significant impacts on economic output in the borough in the future. Those aged 16 – 64 years old currently represent 62% of Newcastle-under-Lyme's population¹²².

Housing and affordability

13.1.4 The latest housing needs evidence is provided by the Newcastle-under-Lyme Housing and Economic Needs Assessment (HEDNA) Further Update 2024¹²³. According to the HEDNA, and based on the standard method calculation as required by the NPPF, there is a minimum housing need of 347 dwellings per annum for the borough.

¹²¹ Office for National Statistics (2021). How life has changed in Newcastle-under-Lyme: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000195/#> [Date accessed: 15/01/24]

¹²² Ibid.

¹²³ Turley (2024) Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update, April 2024

13.1.5 The average UK house price was £301,613 as of November 2023¹²⁴. House prices in Newcastle-under-Lyme are lower than the UK average, at £190,653. On average, full-time workers could expect to pay around 8.3 times their annual workplace-based earnings on purchasing a home in England in 2022¹²⁵. In Newcastle-under-Lyme, this stands at 6.18 times the annual workplace-based earnings.

13.1.6 Affordable housing is defined as “*housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)*” including affordable housing for rent, starter homes and discounted market sales housing¹²⁶. The Newcastle-under-Lyme HEDNA (2024) reports a need for approximately 278 affordable homes annually.

Employment

13.1.7 According to the HEDNA (2024)¹²⁷, there is a need of between 43.1ha and 83.0ha of employment land between 2023 and 2040, whilst the current supply of employment land in the borough stands at 48.9ha.

13.1.8 The improvement and maintenance of high and stable levels of employment alongside economic growth are some of the key aims for growth in the UK. Other objectives include improvements to the education system to increase the skill levels of both children and adults, as well as improved productivity and innovation, particularly with regards to technology.

13.1.9 The percentage of people who are economically active in Newcastle-under-Lyme is higher than average for Great Britain, whereas unemployment is lower than average (see **Table 13.1**). The proportion of those in Newcastle-under-Lyme in professional occupations (21.7%) is lower than the proportion seen in Great Britain as a whole (27.0%).

Table 13.1: Employment rates for the working population (16-64) (2022-2023)¹²⁸

Area	Newcastle-under-Lyme (%)	Great Britain (%)
Economically active	86.0	78.6
Employees	80.3	66.3
Self Employed	(sample size too small for reliable estimate)	9.2
Unemployed	2.9	3.7

¹²⁴ HM Land Registry (2023) UK House Price Index: November 2023. Available at: <https://www.gov.uk/government/statistics/uk-house-price-index-for-november-2023/uk-house-price-index-england-november-2023> [Date accessed: 24/01/24]

¹²⁵ Office for National Statistics (2023) Housing affordability in England and Wales: 2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022> [Date accessed: 24/01/24]

¹²⁶ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 24/01/24]

¹²⁷ Turley (2024) Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update, April 2024

¹²⁸ ONS (2023) nomis: Labour Market Profile – Newcastle-under-Lyme LA. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157176/report.aspx?town=newcastle%20under%20lyme#tabempunemp> [Date accessed: 24/01/24]

Education

- 13.1.10 In Newcastle-under-Lyme, there are 41 primary schools and nine secondary schools and colleges. The majority have 'outstanding' or 'good' OFSTED ratings¹²⁹.
- 13.1.11 Educational attainment has improved between 2009-2019, with an increased proportion of residents in Newcastle-under-Lyme holding National Vocational Qualifications (NVQs).

Transport and accessibility

- 13.1.12 Newcastle-under-Lyme's road network comprises minor, primary and A-roads (see **Figure 13.1**). The M6 running from the east to the north west of the borough provides access to Stafford, Birmingham and the wider motorway network.
- 13.1.13 The A53 and A34 provide a north – south corridor through the borough and the A51, A525, A500 provide east – west links into the West Midlands. Congestion in Newcastle-under-Lyme is only considered an issue in the main urban areas. Traffic delays are concentrated to the east and on the A50, A500 and the M6.

Public transport

- 13.1.14 Newcastle-under-Lyme is served by Kidsgrove railway station. A new station building has been commissioned to meet increased demand¹³⁰. Two more stations are located just outside of the borough: Stoke-on-Trent and Alsager (see **Figure 13.1**). The West Coast mainline runs from the north to the south of the borough, connecting to Liverpool, Manchester, Birmingham and London.
- 13.1.15 Regular bus links are provided across much of Newcastle-under-Lyme. The majority of bus stops are concentrated in the east of the borough in the Newcastle urban area. Two thirds of residents live within 350m of a bus stop, however many residents still struggle to access services¹³¹.
- 13.1.16 In terms of onward and international travel, the nearest airport is Manchester Airport, located approximately 40km north of Newcastle-under-Lyme.

Pedestrian and cycle access

- 13.1.17 Newcastle-under-Lyme's Public Right of Way (PRoW) network (see **Figure 13.2**) includes routes along minor roads and connecting rural areas. These provide a recreational resource as well as links to other modes of transport. However, Newcastle-under-Lyme is the lowest performing local authority in Staffordshire for walking zones.

¹²⁹ UK Gov (2023) All schools and colleges in Staffordshire. Available at: <https://www.compare-school-performance.service.gov.uk/schools-by-type?step=default&table=schools®ion=860&geographic=la&for=ofsted&page=7> [Date accessed: 24/01/24]

¹³⁰ Newcastle-under-Lyme Borough Council (2024). Kidsgrove Town Deal project: Kidsgrove Station. Available at: <https://www.newcastle-staffs.gov.uk/kidsgrove-town-deal-projects-1/kidsgrove-town-deal-project-kidsgrove-station/2#:~:text=Kidsgrove%20Station%20represents%20a%20key,Kidsgrove%20on%20an%20average%20weekday.> [Date accessed: 09/02/24]

¹³¹ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan: Sustainability Appraisal Scoping Report August 2021. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s35932/SA%20Scoping%20Final%20002.pdf> [Date accessed: 23/01/24]

- 13.1.18 Cycle networks are sparse and large sections are located along A roads. Cycling currently contributes towards a small proportion of journeys in Newcastle-under-Lyme; however, there are aspirations to continue to promote increased cycle use. Staffordshire is taking on £31m of investment as part of the government's 'Better Safety, Better Mobility and Better Streets' scheme. This will include improvements to the cycling and walking networks in Newcastle-under-Lyme¹³².

¹³² Staffordshire County Council (2021) Local Cycling and Walking Infrastructure Plan 2021-2031. Available at: <https://www.staffordshire.gov.uk/Transport/Transport-Planning/Walking-and-cycling.aspx> [Date accessed: 24/01/24]

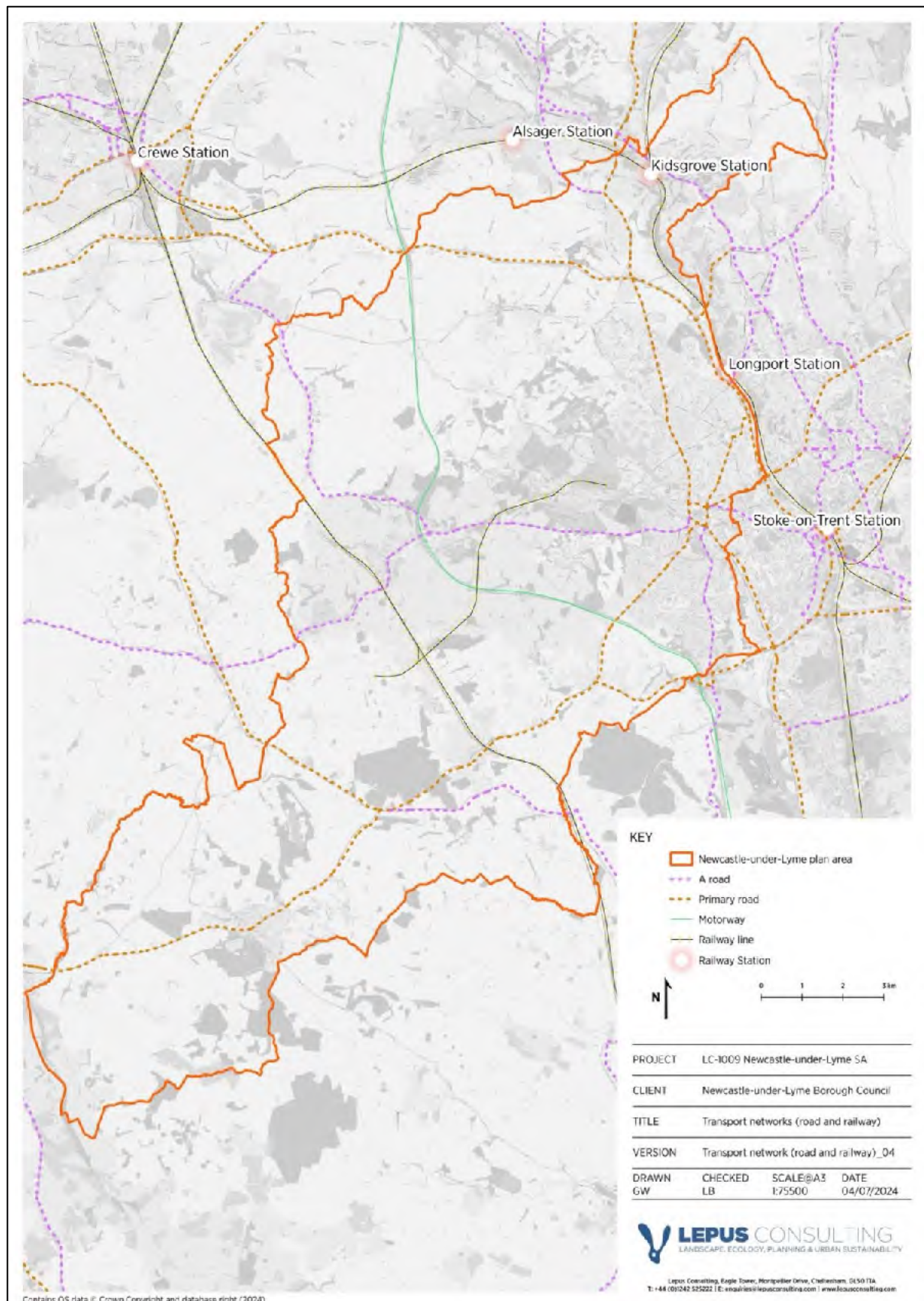


Figure 13.1: The railway and road network within Newcastle-under-Lyme

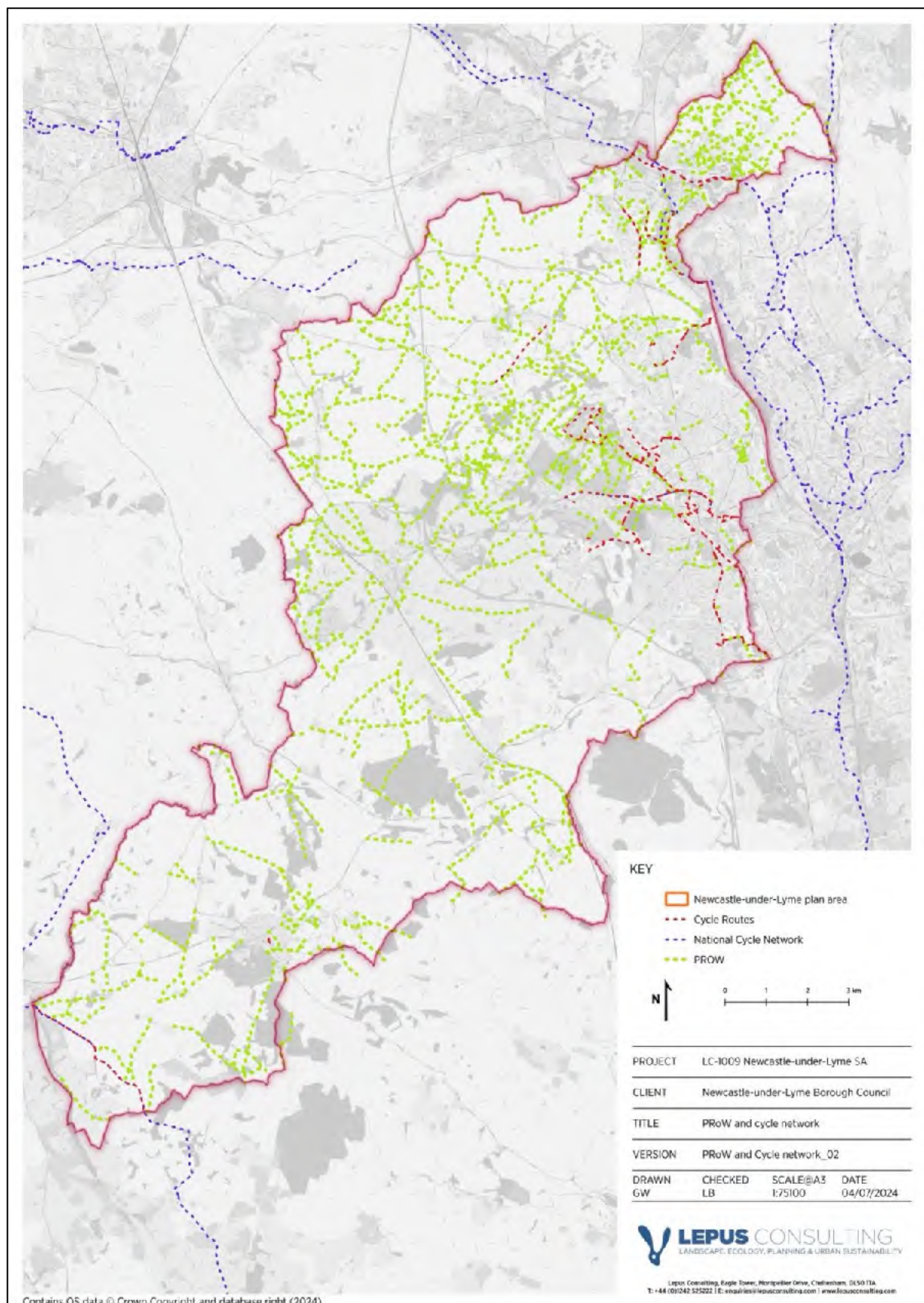


Figure 13.2: Cycle paths and PROW within Newcastle-under-Lyme

Digital connectivity

- 13.1.19 Digital connectivity includes the availability of fast broadband speeds, such as fibre, as well as mobile connectivity. Good digital connectivity can significantly enhance quality of life for local residents as well as the ability for businesses to operate effectively and to compete in the global market, helping to drive investment and employment opportunities. Newcastle-under-Lyme Digital Strategy 2019-2022¹³³ was introduced to implement and support digital connectivity, providing infrastructure and knowledge to provide easy-to-use online services for the borough's residents and businesses. Within Newcastle-under-Lyme town deal projects¹³⁴, smart infrastructure is an objective. The scheme will build upon private sector investment in the roll out of high-speed gigabit digital infrastructure across the borough.

Deprivation and crime

- 13.1.20 Although suburban and rural parts of Newcastle-under-Lyme are relatively affluent, there are pockets of deprivation. The Index of Multiple Deprivation (IMD) is a nationally recognised measure of deprivation at the Lower Super Output Area (LSOA). The lower IMD average rank number relates to more deprived areas¹³⁵. The average rank is calculated by averaging all LSOA ranks in each larger area after they have been population weighted. A decile of 1 indicates an LSOA falls within the most deprived 10% nationally, whereas a decile of 10 indicates an LSOA falls within the least deprived 10% nationally. Newcastle-under-Lyme averages at decile 6. The deciles for each LSOA in the borough are shown on **Figure 13.3**, indicating that deprivation is generally higher towards the north east, adjacent to Stoke-on-Trent.
- 13.1.21 In the year ending September 2023, a total of 9,223 crimes were recorded in Newcastle-under-Lyme¹³⁶. This was the second highest of all Staffordshire LPAs. The most common crimes within the borough are violent crimes (particularly stalking and harassment) and theft.

¹³³ Newcastle-under-Lyme Borough Council (2019) Digital Strategy 2019-2022: for Newcastle-under-Lyme. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s30730/6A1%20Draft%20Digital%20Strategy%202.pdf> [Date accessed: 12/02/24]

¹³⁴ Newcastle-under-Lyme Borough Council (2024) Newcastle-under-Lyme Town Deal projects. Available at: <https://www.newcastle-staffs.gov.uk/newcastle-town-deal/newcastle-lyme-town-deal-projects/2> [Date accessed: 12/02/24]

¹³⁵ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 24/01/24]

¹³⁶ ONS (2024). Crime in England and Wales: year ending September 2023. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingseptember2023> [Date accessed: 12/02/24]

Fuel poverty

- 13.1.22 Fuel poverty is defined by the Warm Homes and Energy Conservation Act as being someone living on a lower income in a home which cannot be kept warm at a reasonable cost. The proportion of households in the borough which are considered to be fuel poor in 2022 was 18.4%, which is higher than the proportion for Staffordshire County overall at 15.3%¹³⁷.

¹³⁷ Department for Business, Energy and Industrial Strategy (2022) Sub-regional fuel poverty data 2022. Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2022>. [Date accessed: 24/01/24]

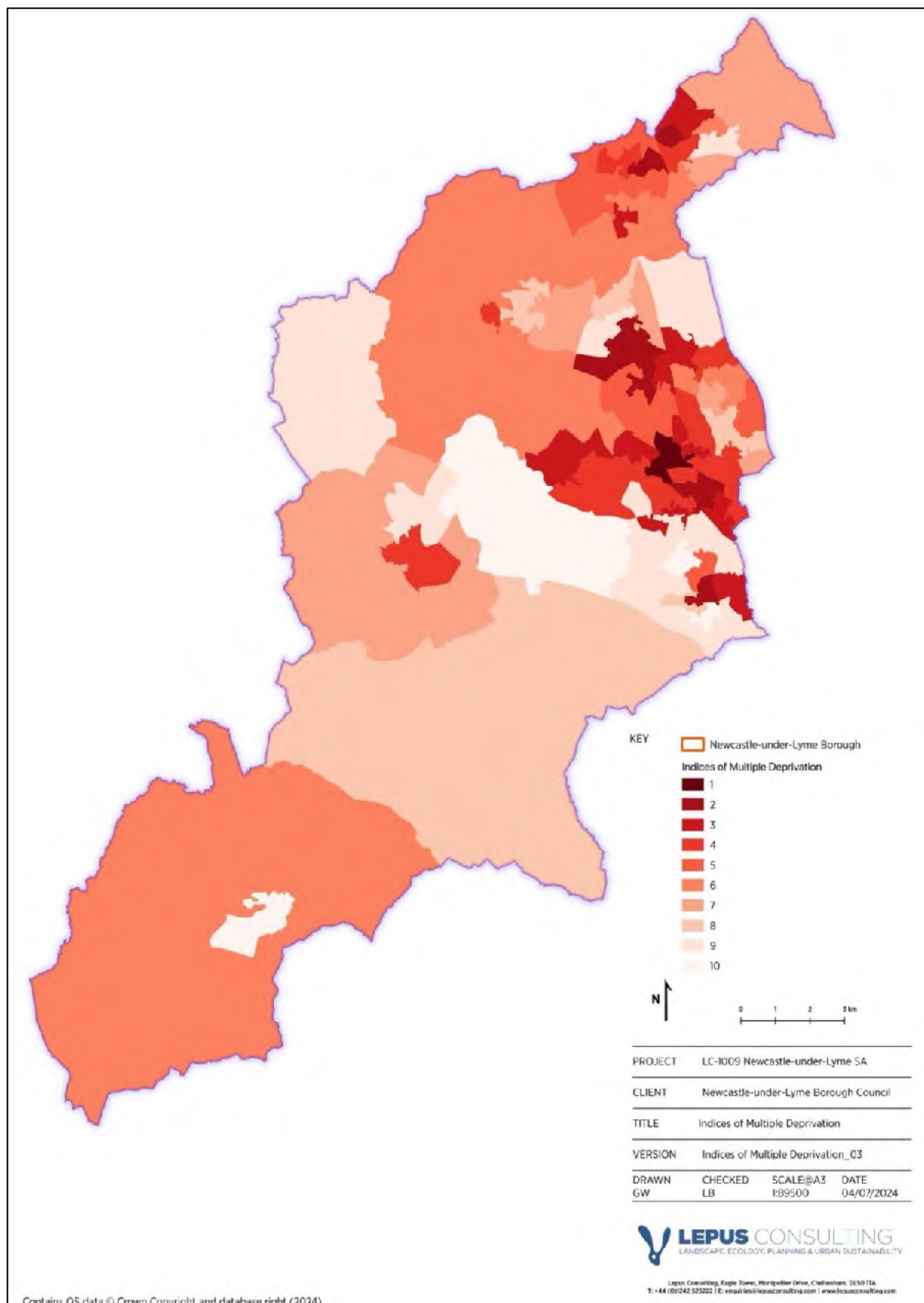


Figure 13.3: Indices of Multiple Deprivation deciles within Newcastle-under-Lyme

Equality Impact Assessment

- 13.1.23 The completion of EqIAs is a legal requirement under race, disability and gender equality legislation. EqIA is a systematic and evidence-based tool, which enables NuLBC to consider the likely impact of the Plan on different groups of people who share a protected characteristic, identified in the Equality Act.
- 13.1.24 The Equality Act 2010¹³⁸ provides a legal framework to protect individuals from unfair treatment and promotes a fair and equal society. It seeks to highlight and strengthen the laws which prevent discrimination. Under the Equality Act, there are nine protected characteristics:
- Age;
 - Disability;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief;
 - Sex; and
 - Sexual orientation.
- 13.1.25 Newcastle-under-Lyme is home to individuals from many different religions, cultures, communities and backgrounds. According to the 2021 Census, 92.9% of Newcastle-under-Lyme's population identified as White, 3.8% as Asian, 1.0% as Black, 1.6% as Mixed and 0.7% as 'other'¹³⁹. The majority of residents' religious status in the borough is Christian at 51.8%, with only 3% of residents classed as Hindu, Sikh, Buddhist or Muslim. Newcastle-under-Lyme also has an aging population with the proportion of residents aged 50-64 years increasing from 19.6% to 20.7% and 65-74 years increasing from 9.7% to 11.5% between 2011 and 2021¹⁴⁰. Therefore, the borough is facing increasing pressures in meeting the appropriate specific care and housing needs of its older residents.
- 13.1.26 The Equality Act focuses on four main types of discrimination: direct discrimination; indirect discrimination; harassment; and victimisation. NuLBC proposes four objectives for equality, diversity and inclusion¹⁴¹ demonstrating a commitment to providing and promoting equality of opportunity for everybody.
- 13.1.27 These themes have been embedded within the SA Framework for SA Objective 10: Equality (see **Appendix A**) which has been used to assess site allocations, policies and reasonable alternatives throughout the SA process, with outputs fed back to NuLBC to help decision making on an iterative basis as the Local Plan has been prepared.

¹³⁸ Equality Act 2010. Available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 24/01/24]

¹³⁹ ONS (2023) How life has changed in NuL: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000195/> [Date accessed: 24/01/24]

¹⁴⁰ Ibid.

¹⁴¹ Newcastle-under-Lyme Borough Council (2023) Equality, diversity and inclusion objectives. Available at: <https://www.sstaffs.gov.uk/equality-diversity-and-inclusion-objectives> [Date accessed: 24/01/24]

- 13.1.28 A further EqIA screening of policies has been undertaken to explore the extent to which each of the Local Plan policies would affect the protected characteristics as identified in the Equality Act, presented within **Appendix K**.

Waste

- 13.1.29 Throughout Newcastle-under-Lyme and nationally, there is a need to increase the proportion of waste sent for reuse, recycling or composting. Government guidance documents including the 25 Year Environment Plan¹⁴² and Waste Strategy for England¹⁴³ highlight the importance of moving towards sustainable waste management and cutting down on hazardous waste and single-use plastics which lead to adverse implications for the health of people and the environment.
- 13.1.30 The proposed development within Newcastle-under-Lyme and associated increase in residents would be expected to result in an increase in waste produced.
- 13.1.31 Newcastle-under-Lyme reported 50,856 tonnes of total household waste in 2021 – 2022¹⁴⁴. The proportion of local authority collected waste in Newcastle-under-Lyme which is recycled, reused or composted is 40.5%.

Minerals

- 13.1.32 Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Mineral Safeguarding Areas (MSAs) designated by minerals planning authorities cover known deposits of minerals which should be safeguarded from unnecessary sterilisation by non-mineral development. Infrastructure sites used for the 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.

¹⁴² Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf. [Date accessed: 24/01/24]

¹⁴³ Defra (2018) Our Waste, Our Resources: A Strategy for England. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf. [Date accessed: 24/01/24]

¹⁴⁴ Department for Environment Food and Rural Affairs (2022) Local authority collected waste generation from January 2010 to March 2021. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>. [Date accessed: 24/01/24]



Key issues relating to population and material assets





- ⇒ The borough's economy is growing at a slower rate than neighbouring boroughs, providing less job opportunities.
- ⇒ The amount of business units in the borough has grown at a significantly lower rate than average for the West Midlands and nationally.
- ⇒ The borough contains 79 LSOAs, of which two are identified as being within the most deprived 10% of LSOAs nationally.
- ⇒ Housing stock growth in Newcastle-under-Lyme has grown by circa 1.9%, slower than rates in the West Midlands (3.5%) and England (3.7%), therefore, housing prices are expected to increase.
- ⇒ There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work.
- ⇒ The borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones.
- ⇒ Mineral Safeguarding Areas are spread across the borough and should be protected.
- ⇒ The council should seek to increase the scope of goods that are collected to be recycled to reduce the large amount of waste produced in the borough.

13.2 Impacts on population and material assets

13.2.1 **Box 13.1** presents a plan-wide summary of the adverse impacts on population and material assets that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations.

Box 13.1: Summary of identified impacts on population and material assets

Impact on population and material assets	Summary of identified impact
 <p>Provision of housing to meet local need</p>	<p>The Local Plan proposes the development of 8,000 dwellings across the Plan period to 2040. This would be expected to meet the identified housing need. The degree to which residents from vulnerable groups, such as those on low incomes and the elderly, will benefit from the increased housing provision will be dependent upon the size, type and tenure of housing provided.</p>
 <p>Provision of employment opportunities</p>	<p>The Local Plan proposes the development of 63ha of employment floorspace. The Plan would be likely to have a positive impact on the local economy, as well as the wellbeing of residents. The proposals in the Local Plan would be expected to satisfy the identified requirements for the borough in line with the latest evidenced needs.</p>

Impact on population and material assets	Summary of identified impact
 <p>Sustainable access to services and facilities</p>	<p>Some site allocations are situated outside of sustainable distances to essential services, such as being located over 800m from primary schools, bus stops and local convenience stores, or over 1.2km from railway stations, secondary schools and employment sites. Good access to these services is essential to reduce reliance on private car use, encourage healthy and active lifestyles and provide accessibility to spaces which could potentially have benefits to mental wellbeing and community cohesion.</p> <p>Of the 47 sites allocated for residential or mixed-use development, the majority would have sustainable access to a primary school, however, five sites (AB15, CH14, KL13 and LW53) lie outside the 800m sustainable distance for access to a primary school and 20 sites lie outside the 1.2km sustainable distance to a secondary school.</p> <p>The majority of sites would be anticipated to be situated within an 800m sustainable distance to a local store to meet day-to-day food needs, however, ten sites lie outside the sustainable distance to access local retail services. A total of 43 sites lie outside the sustainable distance for access to a leisure centre.</p> <p>Site SB12, LW53, LW87, LW74, NC13 and TB19 residential-led site allocations are located over a 1.2km sustainable distance to employment opportunities.</p> <p>Sustainable access to healthcare services is considered under Chapter 11: Human Health.</p>
 <p>Increased pressure on local services and facilities</p>	<p>The proposed development within the Local Plan is expected to increase population density across Newcastle-under-Lyme. This will be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces.</p>
 <p>Effects on community cohesion</p>	<p>Community cohesion is important to help ensure residents are living happy and healthy lifestyles. Interactive and vibrant communities often benefit from a strong sense of place, a reduced fear of crime and have economic benefits.</p> <p>The Local Plan will be likely to have a positive effect with regard to establishing and maintaining cohesive communities, through seeking to provide a range of housing, employment opportunities and supporting infrastructure to meet the varied needs of the local population.</p>
 <p>Increased household waste generation</p>	<p>Waste management is jointly coordinated by the Staffordshire Joint Waste Management Board (JWMB) which incorporates Staffordshire County Council, Stoke-on-Trent City Council and the eight districts and boroughs within Staffordshire, including NuLBC. NuLBC has responsibility for the provision of collection and recycling services for households as part of the management of waste in the county.</p> <p>The proposed development of 8,000 new dwellings within the Local Plan is expected to increase household waste generation, and have a potential adverse effect on the capacity of waste management facilities within the Plan area.</p>

Impact on population and material assets



Impacts on minerals resources

Summary of identified impact

Where a development proposal coincides with an identified MSA, as set out in the Minerals Local Plan¹⁴⁵, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals will be inaccessible for potential extraction in the future. A total of 50 sites coincide with MSAs and could potentially risk sterilisation of these resources by introducing non-minerals development.

13.3 Local Plan mitigation

- 13.3.1 Many of the Local Plan policies would be expected to have positive residual effects in relation to population, in particular for housing and employment floorspace provision. The spatial strategy for development in Newcastle-under-Lyme to 2040 directs the majority of new development towards higher tier settlements and existing urban areas, in line with the settlement hierarchy and the provision of services and facilities. The policies which will help to mitigate adverse effects on population and material assets are discussed in **Box 13.2**.

Box 13.2: Mitigating effects of the Local Plan policies on population and material assets

Policy mitigation for population and material assets



Provision of housing to meet local need

Summary of mitigating effect

Policy **PSD1: Overall Development Strategy** sets out the Council's overall approach to the development strategy for the Plan period to 2040 including the delivery of a minimum of 63ha of new employment land and 8,000 dwellings to meet the identified housing and employment needs.

Policy **HOU1: Affordable Housing** will help to ensure that the Local Plan delivers an appropriate distribution of affordable housing that meets the varied needs of current and future residents of the borough.

Policy **HOU2: Housing Mix and Density** aims to ensure that the Local Plan delivers an appropriate density and mix of housing to meet the varied needs of current and future residents, whilst responding to the local characteristics and sensitivities.

Various Local Plan policies, including Policies **HOU3: Housing Standards**, **HOU4: Gypsy, Travellers and Travelling Showpeople**, **HOU5: Specialist Needs Housing**, **HOU6: Self Build and Custom Dwellings** and **HOU7: Homes in Multiple Occupation** will ensure that the varied needs of Newcastle-under-Lyme's different communities are met in a sustainable manner.

¹⁴⁵ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/mineralsLocalPlan.aspx> [Date accessed: 07/06/24]

Policy mitigation for population and material assets

Summary of mitigating effect



Provision of employment opportunities

Policy **EMP1: Employment** seeks to meet the identified employment land needs within Newcastle-under-Lyme over the Plan period, through supporting proposals for the expansion, intensification or redevelopment of employment sites where this would not compromise other objectives of the Local Plan.

Policy **EMP2: Existing Employment Sites** will ensure that any proposals for alternative uses on existing employment land are only supported where the land is no longer suitable or required for employment uses, and the alternative use is appropriate for its surroundings.

Policy **PSD1: Overall Development Strategy** sets out the Council's overall approach to the development strategy for the Plan period to 2040 including the delivery of a minimum of 63ha of new employment land, in combination with supporting the existing supply of approximately 43ha of employment land. This policy will ensure the identified employment needs are met.



Sustainable access to services and facilities

Policy **IN2: Transport and Accessibility** and various site policies promote sustainable transport and improved connectivity to local services, including schools and jobs, and support improved links to Kidsgrove Railway Station. These introduce measures which ensure development proposals that generate a significant amount of travel movements are informed by a Travel Plan.

Policies **PSD2: Settlement Hierarchy** and **PSD3: Distribution of Development** set out the hierarchy of settlements within the borough and direct development in accordance with infrastructure service provision, namely by prioritising development in and around the town centres where sustainable transport and active travel options are most prevalent.

Policies **PSD6: Health and Wellbeing**, **IN4: Cycleways, Bridleways and Public Rights of Way**, **SE14: Green and Blue Infrastructure**, **PSD7: Design** and various site policies aim to ensure that development proposals provide good access, including via active travel, which may help to encourage active lifestyles and increase the uptake of cycling and walking, through the provision of safe and accessible routes.

Policy **EMP1: Employment** will ensure that employment sites provide "*high quality sustainable transport connections*", and various site policies ensure new employment developments will be well-connected to the road network with mitigations for increased capacity.

Policy **RET4: Newcastle-under-Lyme Town Centre** and **RET5: Kidsgrove Town Centre** support enhancements to permeability of the public realm for pedestrians and cyclists, and encourage improved public transport options and connectivity. A new "*shared services hub*" is proposed in Kidsgrove, and opportunities for diversified town centre uses are supported in Newcastle-under-Lyme.

Policy **SA1: General Requirements** will ensure that new developments are informed by transport assessments and travel plans, in accordance with other Local Plan policies, and cross-references to the necessary strategic transport mitigation measures to reduce or alleviate cumulative adverse effects on the wider transport network.

Policy mitigation for population and material assets



Increased pressure on local services and facilities

Summary of mitigating effect

Policy **IN1: Infrastructure** will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, which includes sustainable transport and social infrastructure. The policy supports the expansion of Madeley High School to cater for future demand on school places.

Policy **IN5: Provision of Community Facilities** will help to safeguard and improve services for use by local communities, in order to ensure there is sufficient capacity to meet evidenced needs.



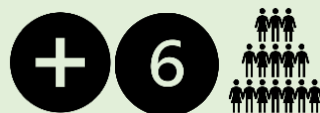
Impacts on community cohesion

Policy **IN5: Provision of Community Facilities** will help to safeguard and improve services for use by local communities, in line with evidenced needs.

Policy **PSD7: Design**, development is guided to improve accessibility and connectivity to align with the Building for a Healthy Life (BHL) design toolkit, that includes provision of high-quality neighbourhoods which are well connected via active travel routes, with integrated open spaces and green/blue infrastructure in order to benefit quality of life for residents.

Policy **IN1: Infrastructure** will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, including social infrastructure.

Policy **RE1: Retail** will ensure that development proposals for retail and leisure be promoted in appropriate areas, within the defined centres, co-locating facilities and creating a sense of community within local centres.



Increased household waste generation

Policies **HOU7: Homes in Multiple Occupation**, **HOU10: Extensions, Alterations and Relationships between Dwellings**, **HOU11: Tandem or Backland Development** and **HOU4 Gypsy, Travellers and Travelling Showpeople** seek to ensure there is suitable provision for bin storage, recycling and waste collection at development sites.

Policy **RET4: Newcastle-under-Lyme Town Centre** will ensure new residential development in Newcastle-under-Lyme Town Centre is well served by waste management and recycling facilities.

Policy **IN1: Infrastructure** supports improvements to household waste recycling services, such as the recycling centre at Leycett Lane.



Impacts on minerals resources

Policy **SA1: General Requirements** and various site policies will ensure that where proposed development sites are located within an MSA, a minerals resource assessment is carried out. This will be likely to ensure the conservation of mineral resources and ensure minerals are extracted prior to development, where viable and practicable, in accordance with the adopted Minerals Local Plan for Staffordshire.

13.4 Residual effects on population and material assets

13.4.1 Many of the policies would be expected to have positive residual effects in relation to population, in particular for housing and employment floorspace provision. A residual adverse effect in relation to material assets would be likely to be the expected increase in household waste generation over the Plan period. Residual effects in relation to population and material assets are discussed further in Box 13.3.

Box 13.3: Residual effects for population and material assets

Residual effects	Further details of the residual effect
Provision of housing to meet local need	<p>In order to meet the identified housing need, the Local Plan proposes to deliver at least 8,000 new dwellings. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. All new dwellings will be required to meet the requirements of the Building Regulations relating to creating accessible and adaptable dwellings. The Plan seeks to deliver sites sufficient to meet the needs of Gypsies, Travellers and Travelling Showpeople, as assessed in the GTAA¹⁴⁶.</p> <p>The Plan aims to deliver the identified housing need, therefore a positive residual effect on housing is anticipated.</p>
Provision of employment opportunities	<p>The Plan seeks to deliver 63ha of employment land, exceeding the need identified in the latest HEDNA¹⁴⁷. All proposed allocations for residential or mixed-use development are anticipated to locate new residents within sustainable distances of employment opportunities or provide sustainable transport choices to access employment opportunities. A positive residual effect on employment provision is anticipated.</p>
Access to, and demand on, local services and facilities	<p>Policies within the Local Plan would be anticipated to help improve residents' accessibility via sustainable transport options, including improvements to the rail and bus network and enhanced pedestrian and cycle networks.</p> <p>The Newcastle-under-Lyme policies are expected to improve access to local services and facilities for the majority of sites through providing improved transport networks, developer contributions to services and new service provision. However, access could remain limited within a small number of rurally located sites although the implementation of Travel Plans has potential for this to be mitigated. On balance, a residual negligible impact is identified for access to local services.</p>
Improved community cohesion	<p>The Local Plan policies demonstrate NuLBC's commitment to enhancing community cohesion by addressing the diverse accommodation needs of the population, safeguarding community services and facilities, and encouraging development proposals to incorporate careful design which delivers a high-quality public realm and considers opportunities to co-locate new development with community facilities and open spaces.</p> <p>The impact of this broad range of policy interventions is anticipated to improve community cohesion through improving opportunities for social interaction, sense of place and reducing social inequalities. A positive residual effect on community cohesion is anticipated.</p>

¹⁴⁶ Arc4 (2024) Gypsy and Traveller and Travelling Showperson Accommodation Assessment. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 05/07/24]

¹⁴⁷ Turley (2024) Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update, April 2024

Residual effects	Further details of the residual effect
Increased household waste generation	<p>The role of the Local Plan in waste management can be to set guidance or requirements for the reduction of construction waste in new development and to ensure design guidance requires new development to accommodate suitable spaces for recycling and waste storage and collection.</p> <p>Local Plan policies promote adequate bin storage, and the collection and recycling of household waste in order to cope with the increased capacity of waste generation. In addition, within the Staffordshire Joint Municipal Waste Management Strategy, NuLBC is committed to increasing household recycling rates¹⁴⁸.</p> <p>It is difficult for the Local Plan to specifically reduce waste generation within the Plan area, although all household waste in Newcastle-under-Lyme is incinerated for energy purposes. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 8,000 new households is expected to increase waste production to some extent and potentially impact the capacity of these facilities.</p> <p>The impact of increased waste generation on the capacity of waste management facilities could potentially be a long-term albeit potentially temporary significant effect.</p>
Impacts on minerals resources	<p>Policy SA1, alongside the Staffordshire Minerals Local Plan¹⁴⁹ seeks to prevent the unnecessary sterilisation of mineral resources from non-minerals development, which would be expected to ensure that potential impact on safeguarded minerals is avoided or minimised. Overall, a minor positive effect on the conservation of mineral resources will be expected.</p>

¹⁴⁸ Staffordshire Waste Partnership (2013) 2013 Refresh of the Joint Municipal Waste Management Strategy for Staffordshire & Stoke-on-Trent (2007-2020). Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/Documents/2013-Refresh-Headline-Strategy.pdf> [Date accessed: 02/07/23]

¹⁴⁹ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Documents/The-Minerals-Local-Plan-for-Staffordshire-2015-2030.PDF> [Date accessed: 26/06/24]

14 Soil

14.1 Baseline

- 14.1.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines¹⁵⁰. Soil is also one of the most important natural carbon sinks globally and its protection is vital in efforts to mitigate anthropogenic climate change. It can reduce flood risk, alleviate flood damage and improve local water and air quality to the benefit of ecosystem and human health.
- 14.1.2 In accordance with the core planning principles of the NPPF¹⁵¹, development on previously developed land is recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land.
- 14.1.3 For development to be sustainable, decision makers must make best efforts to conserve soil resources. Development such as that proposed in the Local Plan can potentially adversely impact soil stocks, such as by direct loss of soil (e.g. excavation during construction), contamination, increased erosion and breakdown of structure and loss of nutrients. In recent years, soils in the UK have rapidly degraded, predominantly due to intensive agricultural production and industrial pollution. The UK's soil continues to face three main threats, each of which will be exacerbated by climate change¹⁵²: soil erosion by wind and rain; compaction; and organic matter decline.
- 14.1.4 Soils across Newcastle-under-Lyme are varied (see **Table 14.1**), ranging in fertility and carbon storage capability.

Table 14.1: Most prominent/common soils in the borough¹⁵³

Soil	Texture	Permeability	Fertility	Carbon storage	Ground cover
Slowly permeable seasonally wet acid loamy and clayey soils	Loamy and clayey	Impeded drainage	Low	Low	Grassland with some arable and forestry
Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils	Loamy and clayey	Impeded drainage	Moderate	Medium	Seasonally wet pastures and woodlands

¹⁵⁰ Food and Agriculture Organization of the United Nations (2020) Soil ecosystem services. Available at: <http://www.fao.org/agriculture/crops/thematic-sitemap/theme/spi/soil-biodiversity/soil-ecosystems-services/en/> [Date accessed: 23/01/24]

¹⁵¹ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 23/01/24]

¹⁵² Department for Environment, Food & Rural Affairs (2009) Safeguarding our soils – A strategy for England. Available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>. [Date accessed: 23/01/24]

¹⁵³ Cranfield University (2017) Soilscales, Available at: <http://www.landis.org.uk/soilscales/> [Date accessed: 23/01/24]

Soil	Texture	Permeability	Fertility	Carbon storage	Ground cover
Freely draining slightly acid loamy soils	Loamy	Freely draining	Low	Low	Arable and grassland
Slightly acid loamy and clayey soils	Loamy and clayey	Impeded drainage	Moderate to high	Low	Arable and grassland

Agricultural Land Classification

14.1.5 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and Subgrade 3a, are referred to as the 'best and most versatile' (BMV) land. Where site-specific ALC studies have not been completed, it is not possible to identify Subgrade 3a and 3b land. Therefore, for the purposes of the SA a precautionary approach is taken, and potential BMV land is assessed as Grades 1, 2 and 3. The grades 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

14.1.6 The majority of Newcastle-under-Lyme's land is classified as Grade 2 (see **Figure 14.1**). A small area of Grade 1 land is located in the north east of the borough, adjacent to Stoke-on-Trent.

14.1.7 Paragraph 180 of the NPPF¹⁵⁴ states "*planning policies and decisions should contribute to and enhance the natural and local environment by ... recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land*".

14.1.8 The issue of soil was primarily taken into consideration under SA Objective 6 'Natural Resources' which aims to protect, enhance, and ensure efficient use of, the borough's land, soils and water. Soils have been considered to some extent under SA Objectives 2 'Climate Change Adaptation' and 3 'Biodiversity and Geodiversity'.

¹⁵⁴ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 23/01/24]

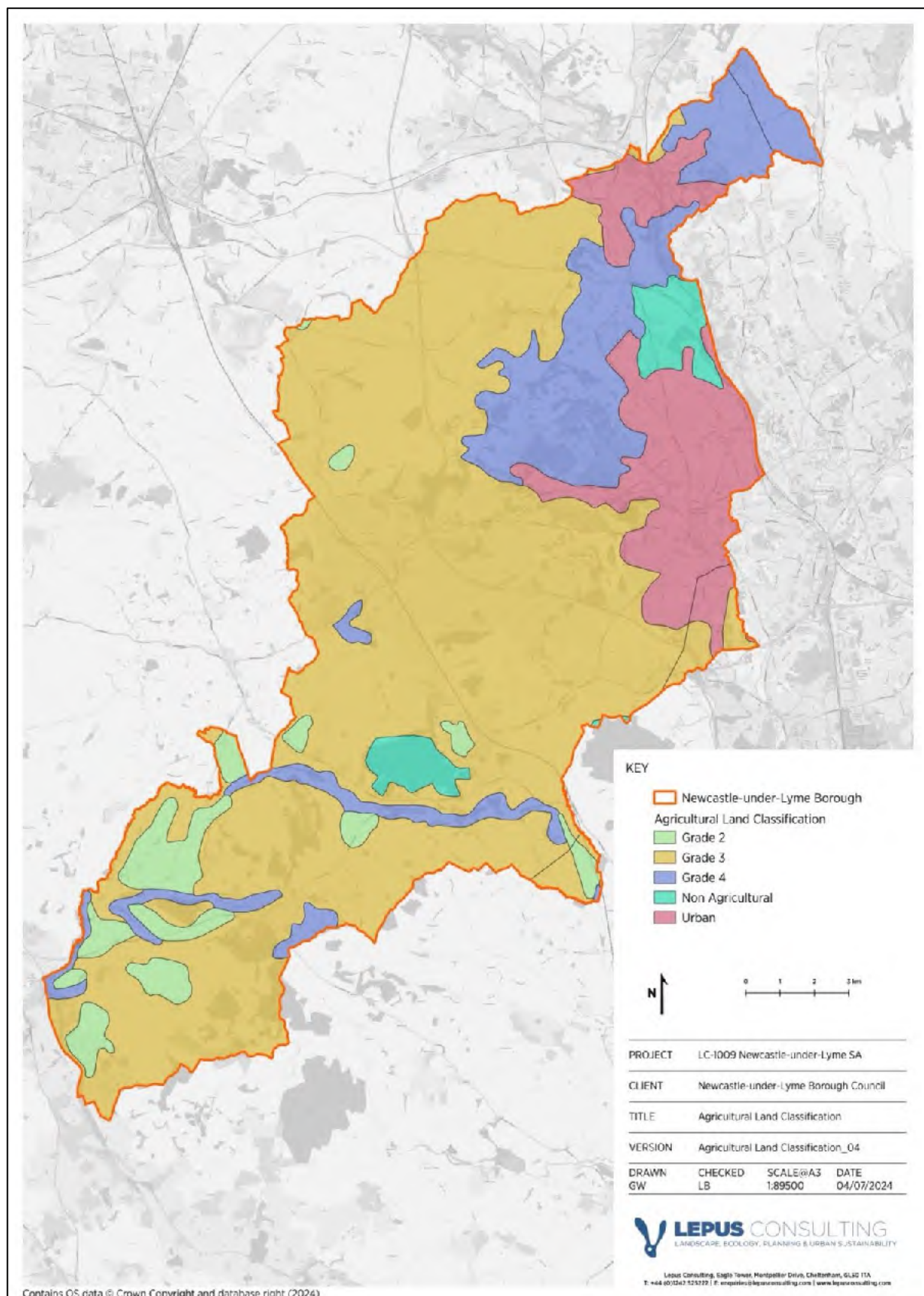


Figure 14.1: Agricultural Land Classification (ALC) across Newcastle-under-Lyme



Key issues relating to soil

- ⇒ The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible.

14.2 Impacts on soil

- 14.2.1 **Box 14.1** sets out a plan-wide summary of the likely impacts on soil that have been identified through the SA process. These impacts are those identified prior to the consideration of mitigation in the form of Local Plan policies.

Box 14.1: Summary of identified impacts on soil



Impact on soil	Summary of identified impact
 <p>Direct loss of soil resources and BMV land</p>	<p>The Local Plan proposes development at 54 allocated sites. Of these 54 sites, 36 allocations are wholly or partially located on previously undeveloped land. Based on the indicative areas of these 36 sites, the Local Plan could result in the loss of up to approximately 342ha of previously undeveloped land¹⁵⁵. The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation.</p> <p>BMV land is defined through the ALC system as Grades 1, 2 and 3a (soil which is most flexible, productive and efficient in response to inputs, and which can best deliver food and non-food crops for future generations). A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.</p>
 <p>Impact on ecosystem services</p>	<p>Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, carbon storage and providing the basis for vegetation to flourish. In order for soil to continue providing each service, careful consideration should be given to its structure and stability. Where construction occurs, soil could potentially be compacted by heavy vehicles on-site. During the occupation or operation phase of development, soil, in some circumstances, could potentially be paved over, become subject to increased footfall or be subject to increased volumes of fertilisers and other chemicals.</p>

¹⁵⁵ Please note this figure is based on gross site areas and so does not take into account net developable areas excluding new open space / green infrastructure provision or sites which are already partially developed.

14.3 Local Plan mitigation

- 14.3.1 The Local Plan seeks to promote an efficient use of natural resources and encourages new development to protect and enhance valued soils including BMV land, where possible. These policies are discussed in **Box 14.2**.

Box 14.2: Mitigating effects of the Local Plan policies on soil

Policy mitigation for soil	Summary of mitigating effect
 <p>Policy mitigation for direct loss of the soil resources and BMV land</p>	<p>Policy SE13: Soil and Agricultural Land sets out protection for BMV land, requiring new development affecting land of ALC Grades 1, 2 and 3a to provide evidence that no suitable alternative sites on land of lower agricultural quality are available.</p> <p>Policy PSD4: Development Boundaries and the Open Countryside encourages the redevelopment and re-use of previously developed land and will only permit new development within the open countryside in specific circumstances. This will help to protect soil resources within these areas and promote an efficient use of land, minimising the loss of undeveloped land for new built development.</p> <p>Policy SE2: Land Contamination and various site policies aim to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This policy could help to reduce the amount of development on previously undeveloped land, and therefore, reduce the loss of ecologically or agriculturally valuable soil resources.</p> <p>Policy CRE1: Climate Change seeks to ensure that development proposals consider ways in which the “<i>design, construction, insulation, layout and orientation</i>” of developments can encourage the efficient use of natural resources, including encouraging opportunities for re-use of existing buildings.</p>
 <p>Policy mitigation for impact on ecosystem services</p>	<p>Policies PSD7: Design, SE14: Green and Blue Infrastructure and SE8: Biodiversity and Geodiversity (supported by SA1: General Requirements), and SE6: Open Space, Sports and Leisure Provision seek to enhance the provision and connectivity of GI/BI, which will help to protect underlying soil resources from erosion.</p> <p>Policy SE11: Trees, Hedgerows and Woodland includes the restoration and enhancement of trees, hedgerows and woodland which help to protect the stability and connectivity of underlying soil resources.</p>

14.4 Residual effects on soil

- 14.4.1 As outlined in **Box 14.2**, the Local Plan includes measures to reduce the quantity of soil lost to development, including directing development towards existing urban areas including previously developed land, ensuring GI and open spaces are maximised, and promoting the efficient use of land. However, some site allocations are situated on previously undeveloped land. The policies within the Local Plan cannot fully mitigate the adverse impacts of development on ecologically and agriculturally important soils. **Box 14.3** sets out the identified residual adverse effects of the Local Plan on soil.

Box 14.3: *Residual effects for soil*

Residual effects	Further details of the residual effect
Loss of soil resources and BMV land	<p>The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. Therefore, a residual adverse effect will be expected.</p> <p>The loss of approximately 342ha of previously undeveloped land, approximately 263ha of which could include BMV land, would be expected to be a long-term and permanent significant effect.</p>
Impact on ecosystem services	<p>Paragraph 180(b) of the NPPF requires planning policies and decisions to enhance the natural environment by “<i>recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services</i>”.</p> <p>Several Local Plan policies aim to increase provision and connectivity of GI across the Plan area, which will be expected to mitigate potential adverse impacts due to the proposed development; however, the proposed development will be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. A residual adverse effect will be expected.</p> <p>The loss of ecosystem services would be likely to be a long-term and permanent significant effect.</p>

15 Water

15.1 Baseline

Flood risk

- 15.1.1 The main watercourses that pass through Newcastle-under-Lyme include the Lyme Brook, Coal Brook, River Tern, Meece Brook, River Lea, Checkley Brook, Loggerheads Brook, Fowlea Brook, Park Brook, Valley Brook, Dean Brook and the Trent and Mersey Canal. The borough is positioned within the North West, Severn and Humber River Basin Management Areas.
- 15.1.2 Areas of Flood Zone 2 and 3 can be found particularly within the north east and west of the borough (see **Figure 15.1**), coinciding with Lyme Brook, Checkley Brook, Coal Brook, River Lea, Meece Brook and River Tern, as well as other subsidiary watercourses which branch from these main rivers. The areas most impacted include Kidsgrove and Silverdale¹⁵⁶. These areas have a risk of fluvial flooding which is greater than 3.3% each year. In line with the NPPF, careful consideration should be given to the level of flood risk new residents are exposed to, as well as the impacts of development on risk.
- 15.1.3 In addition to river flooding, other potential sources of flooding within Newcastle-under-Lyme include groundwater flooding, sewer flooding, and surface water flooding¹⁵⁷. Areas of high, medium and low surface water flood risk are present across the Plan area (see **Figure 15.2**). Surface water flood risk typically follows roads and natural watercourses.
- 15.1.4 Flood risk is exacerbated by loss of vegetation, soil erosion, climate change, extreme weather and urbanisation.
- 15.1.5 It is good practice to make allowances for climate change in flood risk assessments¹⁵⁸. Allowing for the impacts of climate change, such as projections under different CO₂ concentrations, can help to minimise vulnerability whilst providing greater resilience to flooding by anticipating changes to peak river flows, peak rainfall intensities, sea level rise and offshore wind speeds.

¹⁵⁶ JBA Consulting (2019) Level 1 Strategic Flood Risk Assessment, Final Report, 2019. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/765/level-1-strategic-flood-risk-assessment-report> [Date accessed: 23/01/24]

¹⁵⁷ Environment Agency (2009) Flooding in England; national assessment of flood risk. Available at: <https://www.gov.uk/government/publications/flooding-in-england-national-assessment-of-flood-risk> [Date accessed: 23/01/24]

¹⁵⁸ Environment Agency (2022) Flood risk assessments: climate change allowances. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [Date accessed: 23/01/24]

Green infrastructure

- 15.1.6 Green Infrastructure (GI) is a network of multi-functional green space, which is capable of delivering a wide range of environmental and quality of life benefits for local communities¹⁵⁹. 'Blue Infrastructure' is also a term used to refer to rivers, canals, wetlands and other water-based assets that can integrate and link with GI. GI has many benefits including human health, climate change adaptation and wildlife value¹⁶⁰, and can play an important role in helping urban areas adapt to climate change by filtering airborne pollutants, providing shade and cooling and reducing surface water runoff¹⁶¹. GI provision or enhancement within Newcastle-under-Lyme should seek to integrate with any existing or potential GI networks in neighbouring authorities such as Stoke-on-Trent¹⁶².

Water resources

- 15.1.7 The main water service providers for Newcastle-under-Lyme are Severn Trent Water and United Utilities. The annual performance summary for 2023 states that interventions are needed to end water poverty, protect and enhance the environment and adapt to climate change¹⁶³.
- 15.1.8 Surface Water Management Plans are in place for Kidsgrove and Stoke-on-Trent¹⁶⁴. These provide recommendations for 'red zones' as well as recommendations for improvements to data sharing and sustainable drainage systems (SuDS).
- 15.1.9 Severn Trent Draft Water Resources Management Plan (WRMP)¹⁶⁵ sets out the long-term management of water resources between 2025 and 2085 and how the needs of the population will be met. Likely challenges identified in the WRMP include:
- Significant investment is required to ensure water availability can meet growing demands;
 - Without intervention, there is increasing risk of deterioration of the environment as a result of water abstractions; and
 - There is a need to reduce leakage in the water network.

¹⁵⁹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 24/01/24]

¹⁶⁰ Forest Research (2010) Benefits of green infrastructure. Available at: https://cdn.forestryresearch.gov.uk/2010/10/urgp_benefits_of_green_infrastructure.pdf [Date accessed: 24/01/24]

¹⁶¹ Landscape Institute (no date) Green Infrastructure (GI). Available at: <https://www.landscapeinstitute.org/policy/green-infrastructure/>. [Date accessed: 23/01/24]

¹⁶² City of Stoke-on-Trent and Newcastle-under-Lyme Borough Council (2018) Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Joint Local Plan Preferred Options Consultation document 2018. Available at: https://www.stoke.gov.uk/download/downloads/id/999/joint_local_plan_preferred_options_consultation_document.pdf [Date accessed: 23/01/24]

¹⁶³ Severn Trent Water (2023) Annual Performance Report 2023. Available at <https://www.severntrent.com/content/dam/stw/regulatory-library/severn-trent-water-annual-performance-report-revised-2023.pdf> [Date accessed: 23/01/24]

¹⁶⁴ JBA Consulting (2020) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/01/24]

¹⁶⁵ Severn Trent (2024) Water Resources Management Plan 2024. Available at: <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/dwrmp24-draft-documents/> [Date accessed: 23/01/24]

- 15.1.10 The NuLBC and Stoke-on Trent City Council Water Cycle Study (WCS): Phase 1 (2020)¹⁶⁶ assessed development proposals in Newcastle-under-Lyme and Stoke-on-Trent in regard to water supply capacity, wastewater capacity and environmental capacity. The study then sought to inform future demonstratable solutions to the key constraints, including policy recommendations. A potential supply-demand deficit was identified based on development projections at the time.
- 15.1.11 The Phase 2 Outline Water Cycle Study (2024)¹⁶⁷ is specific to Newcastle-under-Lyme Borough and provides an update to the Phase 1 WCS to consider the implications of the new Local Plan. The WCS (2024) includes assessments of the proposed site allocations to identify the level of infrastructure investment that may be required to accommodate the planned growth without leading to harm to the water environment.

Groundwater

- 15.1.12 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks. The Environment Agency (EA) has published details about how they manage and protect groundwater¹⁶⁸. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants, including nitrates from agricultural sources.
- 15.1.13 There are three SPZs¹⁶⁹ in the Plan area:
- **SPZ 1 – Inner Protection Zone:** the 50-day travel time from any point below the water table to the source;
 - **SPZ 2 – Outer Protection Zone:** the 400-day travel time from a point below the water table, with a minimum radius of 250-500m; and
 - **SPZ 3 – Source Catchment Protection Zone:** area around source within which all groundwater recharge is discharged at the source.
- 15.1.14 The southern area of Newcastle-under-Lyme is mostly located within SPZ 3, with smaller areas also covered by SPZ 1 and 2 such as around Dean Brook and the River Tern (see **Figure 15.3**).

¹⁶⁶ JBA Consulting (2020) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

¹⁶⁷ JBA Consulting (2024) Stage 2 Water Cycle Study, Newcastle-under-Lyme. Draft Report, July 2024. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

¹⁶⁸ Environment Agency (2018) The Environment Agency's approach to groundwater protection, February 2018, Version 1.2. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf [Date accessed: 23/01/24]

¹⁶⁹ Environment Agency (2019) Groundwater Source Protection Zones. Available at: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs> [Date accessed: 23/01/24]

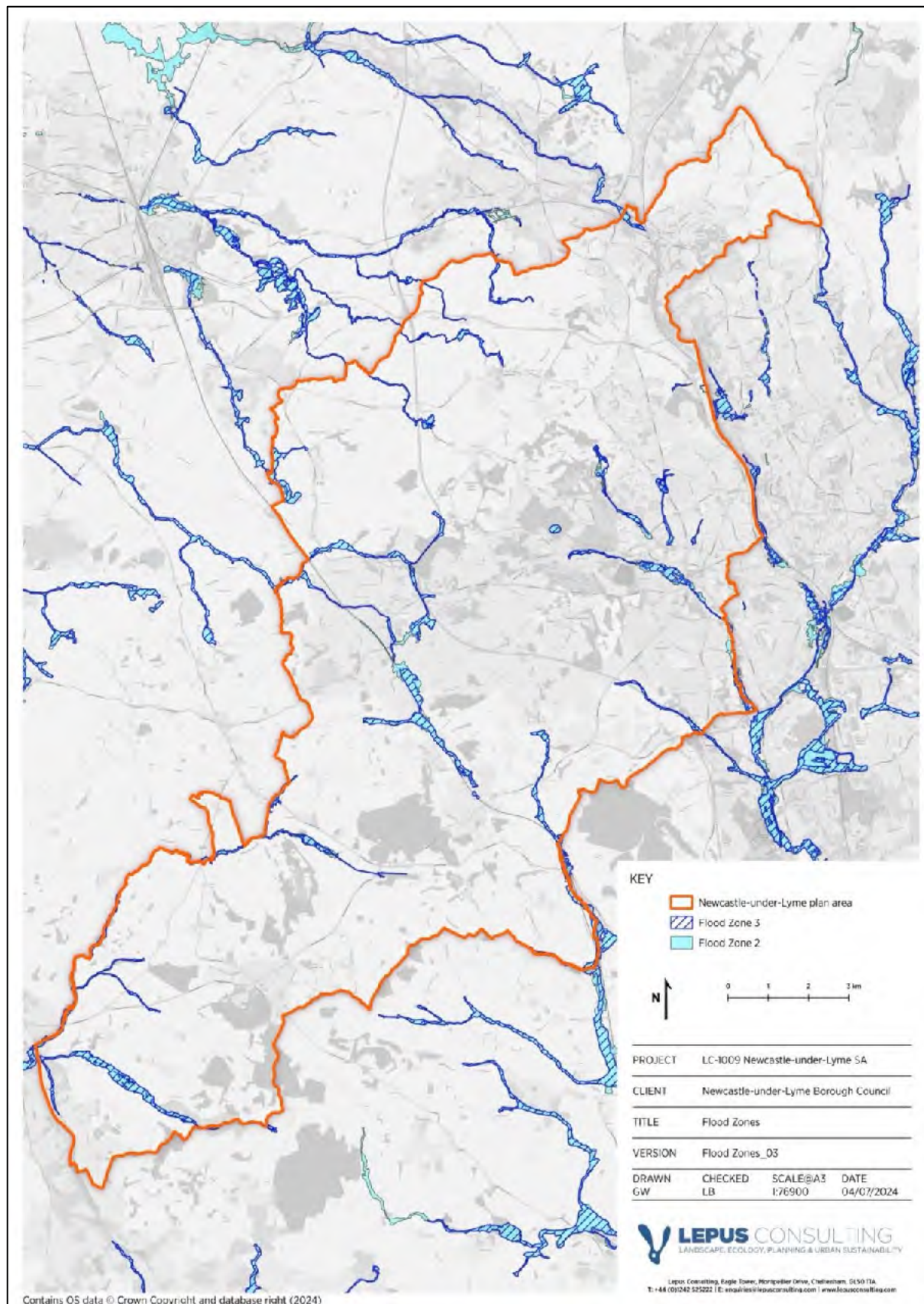


Figure 15.1: Flood Zones in Newcastle-under-Lyme

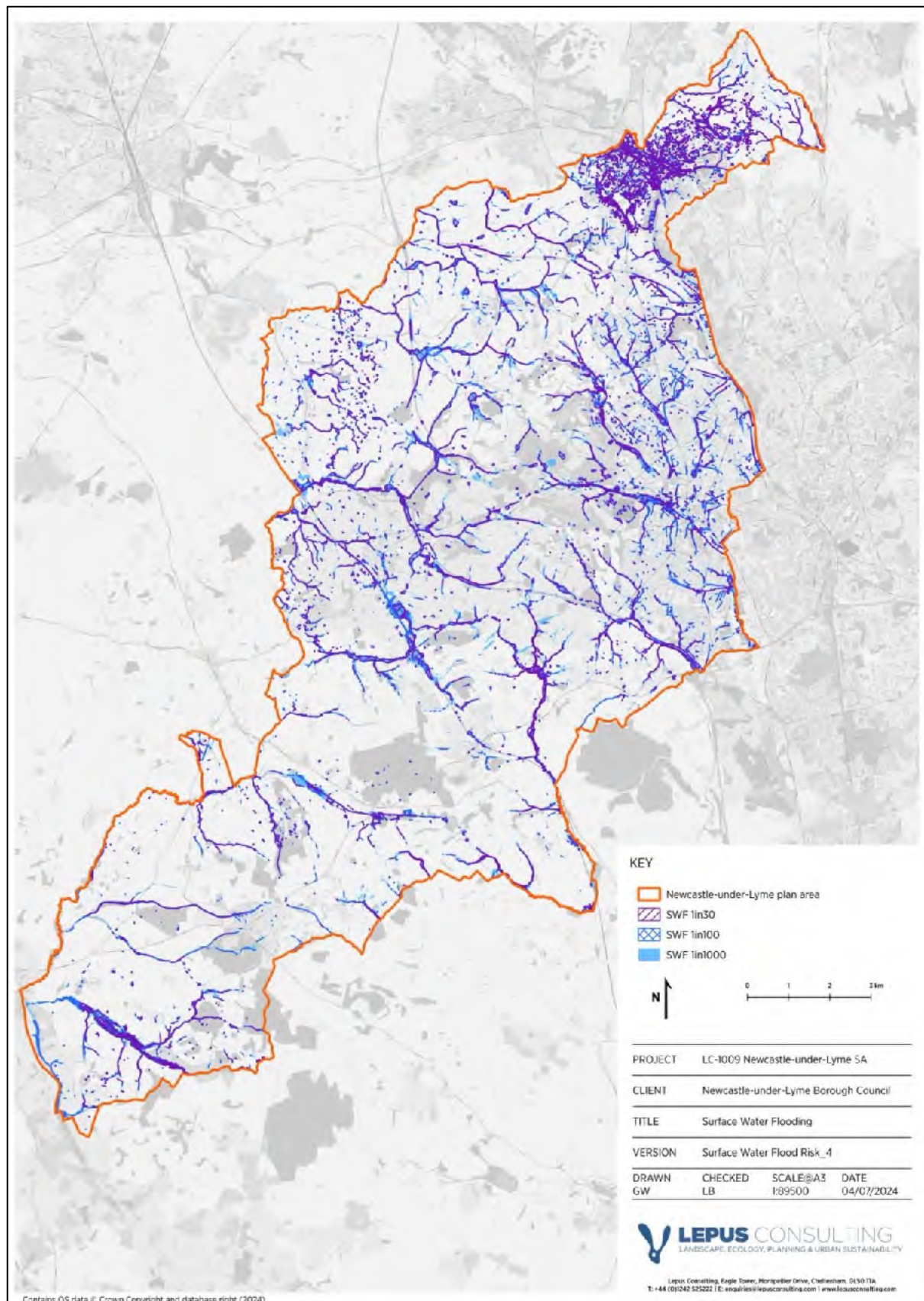


Figure 15.2: Extent of surface water flood risk in Newcastle-under-Lyme

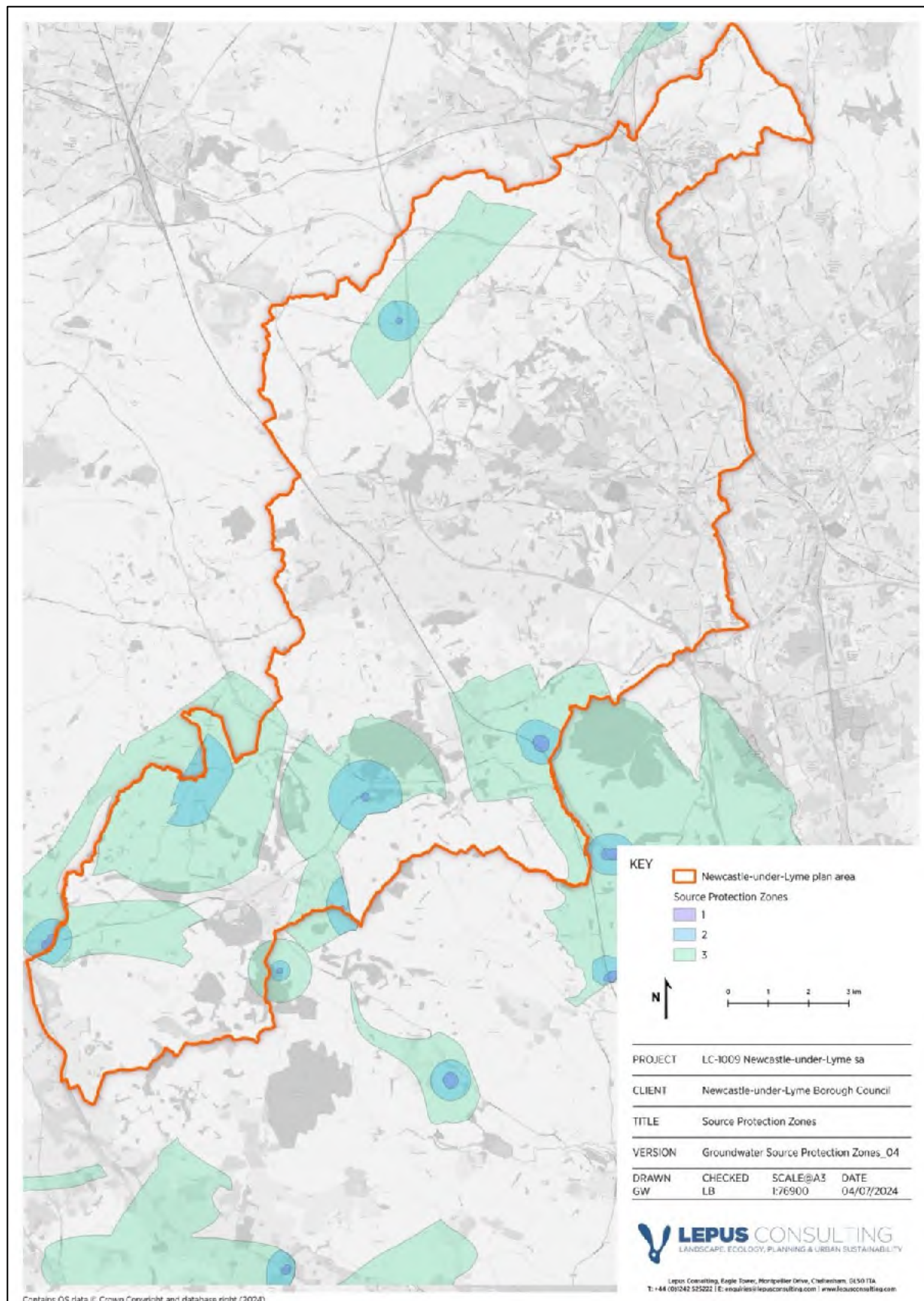


Figure 15.3: Groundwater Source Protection Zones across Newcastle-under-Lyme




Key issues relating to water



- ⇒ Waterbodies across the borough mostly range from 'poor' to 'moderate' Water Framework Directive status.
- ⇒ Most of the borough falls within a Nitrate Vulnerable Zone.
- ⇒ Water availability for extraction varies, with deficits in the water required to support the environment identified at the Meece Brook, meaning it is currently closed to further

15.2 Impacts on water

15.2.1 **Box 15.1** presents a plan-wide summary of the adverse impacts on water that have been identified through the SA process. These adverse impacts are those identified prior to mitigation considerations. **Box 15.2** lists the policies within the Local Plan which will be likely to mitigate, either fully or partially, some of the identified adverse impacts on water. Where mitigating policies are silent, or the contents of the Local Plan only partially mitigates the adverse impacts, a residual adverse effect is identified. **Box 15.3** explores the nature of these residual effects.

Box 15.1: Summary of identified impacts on water

Impact on water	Summary of identified impact
 <p>Fluvial flood risk</p>	<p>Development within Flood Zones 2 or 3 (including 3a and 3b) has the potential to locate site end users at risk of fluvial flooding, may increase the risk of damage to property and increase risks to human health in the immediate area and/or contribute to exacerbation of flood risk in the surrounding areas.</p> <p>The majority of allocated sites are located in Flood Zone 1; however, five of the allocated sites which includes residential-led sites CH13 and TB23, G&T Site 8, and employment-led Sites AB2 and HD10 partially coincide with Flood Zones 2 and 3. Of the five sites, 7% of their total combined area coincides with Flood Zone 2 and 3% of their total combined area coincides with Flood Zone 3.</p>
 <p>Surface water flood risk</p>	<p>Development in areas of surface water flood risk may locate site end users in areas at risk of flooding, with safety implications, and further exacerbate flood risk in the surrounding area.</p> <p>A total of 37 allocated sites coincide with varying extents of surface water flood risk, including 18 sites with some land identified as high risk.</p>
 <p>Reduction in water quality and ecosystem services</p>	<p>Water provides a range of essential ecosystem services, including providing the basis for vegetation to flourish and supporting biodiversity. Development and urbanisation can be associated with adverse impacts on water quality, primarily induced by nitrates from agricultural sources, including risks of water pollution associated with runoff from roads, and from water outflows during storm conditions.</p> <p>The construction and occupation of new development, especially for the 36 allocated sites which comprise either wholly or partially previously undeveloped land, and Site TC40 is located within 10m of the Lyme Brook watercourse, has the potential to increase the risk of contamination and</p>



Impact on water	Summary of identified impact
	<p>pollution of waterways. This is primarily due to the potential loss of soil and surface water / pollutant runoff.</p> <p>Three allocated sites are located within an SPZ, including AB2, LW53 and LW74, where new development could potentially lead to an overall increase in the risk of groundwater contamination or pollution.</p>
 <p>Increased water demand</p>	<p>The proposed development of 8,000 new dwellings set out in the Plan is likely to lead to population growth, which would be likely to increase water demand across the Plan area.</p> <p>The Severn Trent Water WRMP shows a supply-demand deficit regarding water resources, if no action is taken. The WCS (2020)¹⁷⁰ considered the potential impacts of development in the borough and the monitoring and changes to infrastructure required to meet demand. No further study regarding water supply infrastructure was undertaken in the Phase 2 WCS (2024). According to the WCS, with regard to water resources, Severn Trent Water have stated that they "<i>do not envisage a problem</i>" for any sites that are within their water resource zone although it is noted that Severn Trent and United Utilities will comment on site allocations directly which may highlight further issues and required actions.</p>
 <p>Increased pressure on wastewater treatment</p>	<p>The proposed development of 8,000 new dwellings within Newcastle-under-Lyme would be expected to increase the local population, and subsequently, increase the demand for wastewater treatment across the Plan area.</p> <p>The Phase 1 WCS (2020) found that significant new infrastructure and upgrades to the existing network and wastewater treatment works (WwTW) will be required to accommodate growth and recommends early engagement with water companies and that more detailed study is undertaken with regard to the wastewater network. The WCS (2024) highlights potential risks associated with limited treatment capacity during the Plan period at a number of WwTW that will need to be addressed by the relevant water companies.</p>


15.3 Local Plan mitigation

- 15.3.1 Policies within the Local Plan, primarily Policy SE5, aim to reduce flood risk, prevent the decrease of water quality and improve water efficiency in new developments within the Plan area. The provision of GI and open spaces through various other Local Plan policies would also be expected to slow infiltration and help alleviate flood risk to some extent. The policies are discussed in detail in **Box 15.2**.

¹⁷⁰ JBA Consulting (2024) Stage 2 Water Cycle Study, Newcastle-under-Lyme. Draft Report, July 2024. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

Box 15.2: *Mitigating effects of the Local Plan policies on water*

Policy mitigation for water	Summary of mitigating effect
 <p>Fluvial and surface water flood risk</p>	<p>Policy SE3: Flood Risk Management sets out the Council's approach to managing the risk of flooding and water resources within the borough. The policy, alongside SA1: General Requirements, will ensure that development proposals are informed by flood risk assessments, where appropriate, and sets out criteria that must be adhered to for different development scenarios in accordance with the Strategic Flood Risk Assessment (SFRA).</p> <p>Policy SE4: Sustainable Drainage Systems promotes the use of SuDS to manage surface water run-off and reduce the risk of surface water flooding, as well as encouraging opportunities to be sought for integrating multi-functionality.</p> <p>Several Local Plan policies, including Policies PSD7: Design, CRE1: Climate Change, SE8: Biodiversity and Geodiversity, SE11: Trees, Hedgerows and Woodland and SE14: Green and Blue Infrastructure will contribute towards improved provision and connectivity of green/blue infrastructure, which could help deliver benefits to fluvial and surface water flood risk through providing natural flood storage and drainage and reducing water runoff rates.</p> <p>Various site policies aim to locate development away from areas of high fluvial or surface water flood risk, through taking a sequential approach to development which prioritises areas of low flood risk.</p>
 <p>Reduction in water quality and ecosystem services</p>	<p>Policy SE5: Water Resources and Water Quality seeks to conserve, and where possible enhance, the quality of watercourses, aquatic habitats and groundwater, ensuring development takes into account the objectives of the Water Framework Directive and considers capacity limitations that are outlined within the current Water Cycle Study.</p> <p>Policy SE8: Biodiversity and Geodiversity will ensure that where development is likely to have an adverse effect on European sites with regard to water quality or quantity, appropriate mitigation is secured. Furthermore, this policy and others including Policies PSD7: Design, CRE1: Climate Change, SE11: Trees, Hedgerows and Woodland and SE14: Green and Blue Infrastructure include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as natural filtration of water to improve water quality.</p> <p>Policies IN1: Infrastructure and IN7: Utilities (supported by SA1: General Requirements) seek to ensure that the Local Plan provides appropriate and proportionate infrastructure and utilities to deliver the proposed development including surface water disposal, water supply and wastewater treatment infrastructure. This will help to protect water quality in the borough.</p> <p>Through seeking to reduce the likelihood and extent of flood events and ensure the sustainable management of flood water, Policies SE3: Flood Risk Management and SE4: Sustainable Drainage Systems are likely to lead to benefits for the quality of watercourses and groundwater resources.</p>

Policy mitigation for water	Summary of mitigating effect
 <p>Increased demand for water and wastewater treatment</p>	<p>Policy SE5: Water Resources and Water Quality seeks to ensure there is an adequate water supply and promotes the sustainable management of water resources.</p> <p>Policies IN1: Infrastructure and IN7: Utilities (supported by SA1: General Requirements) will help to conserve water resources in the borough through providing adequate surface water disposal, water supply and wastewater treatment infrastructure.</p>

15.4 Residual effects on water

- 15.4.1 Residual adverse effects would be expected to remain in terms of water following the implementation of the Local Plan policies. Further details, and potential recommendations to help mitigate or monitor these adverse impacts are presented in Box 15.3.

Box 15.3: Residual effects for water

Residual effects	Further details of the residual effect
Fluvial and surface water flood risk	<p>A Level 1 Strategic Flood Risk Assessment (SFRA)¹⁷¹ has been prepared to inform the emerging Local Plan. NuLBC has been consulting with the Environment Agency through the preparation of the Local Plan to ensure the sequential test is followed. Furthermore, NuLBC will aim to avoid placing vulnerable uses in Flood Zones 2 and 3, or areas of medium/high surface water flood risk. Sites allocated with areas within these zones will be mitigated using water-compatible used such as GI, as outlined in the Local Plan policies. The SFRA sets out a range of recommendations including to seek opportunities to reduce the overall level of flood risk at development sites through reducing runoff and incorporating GI, amongst others.</p> <p>The WCS (2024)¹⁷² concludes that the impact of increased effluent flows as a result of the increased planned growth in population “<i>is predicted to not impact flood risk in any of the receiving watercourses</i>”. The WCS also sets out a range of recommendations to ensure appropriate monitoring and management of water resources and flood risk continues over the Plan period, including use of SuDS and Natural Flood Management measures.</p> <p>The SFRA process, combined with the Local Plan policies, specifically Policy SE3, will be expected to mitigate potential adverse effects associated with development in areas at risk of fluvial or surface water flooding. Subject to achieving the mitigation recommendations set out in the latest SFRA and WCS, a residual negligible impact on fluvial flooding will be expected.</p>
Reduction in water quality and ecosystem services	<p>As outlined in Box 15.2, several Local Plan policies will be expected to help protect and enhance water quality either directly or indirectly, by ensuring that development proposals incorporate sustainable drainage systems and increase the provision of multi-functional GI.</p>

¹⁷¹ JBA Consulting (2024) Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment. Draft Report, May 2024.

¹⁷² JBA Consulting (2024) Stage 2 Water Cycle Study, Newcastle-under-Lyme. Draft Report, July 2024. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

Residual effects	Further details of the residual effect
	<p>A number of SSSIs and groundwater-dependent terrestrial ecosystems lie within and in close proximity to Newcastle-under-Lyme and have potential to be subject to effects of development upstream. According to the WCS, the main sources of water pollution are from WwTWs, drainage from housing estates, road runoff and commercial discharge. Water quality modelling carried out as part of the WCS (2024) found that <i>"growth could cause deterioration in quality, but this can be prevented by enhancing the treatment level at certain WwTWs. Growth alone would not prevent good ecological status being reached in future. A significant deterioration in water quality at protected sites would not occur as a result of growth during the plan period"</i>.</p> <p>It is likely that a combination of provisions set out in the Local Plan policies and WCS will partially mitigate impacts on water quality and ecosystem services. The implementation of SuDS will also help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to increase the quantity of raw sewage being disposed of in river channels, which will require additional monitoring in order to alleviate water quality issues. A residual adverse impact on water quality and ecosystem services is therefore identified, in line with the precautionary principle.</p> <p>Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant effect.</p>
<p>Increased demand for water and wastewater management</p>	<p>The increased population within the Plan area would be expected to increase water demand, such as for drinking water supply and wastewater treatment, despite measures within national policies and the Local Plan policies to improve water efficiency.</p> <p>The Phase 1 WCS (2020) indicated that Severn Trent Water does not expect water supply infrastructure to be a constraint to development within Newcastle-under-Lyme. This conclusion is still valid as of the updated WCS (2024), pending any site-specific input from water companies and permitting that the WRMP will address the supply-demand deficit and there is sufficient time to adapt to the long-term plan to include emerging trends in population.</p> <p>The WCS (2020) identified some uncertainty regarding the potential for adverse impacts in terms of wastewater collection infrastructure that may require further monitoring and investment in infrastructure upgrades, to ensure that development can be accommodated. The Phase 2 WCS (2024) identifies risks associated with increased spills at storm overflows in some locations, and notes that <i>"further separation of foul and surface water may be required as well as suitable designed SuDS. Early engagement between NULBC, developers and STW and UU is required to ensure that development sites are aligned with provisions of upgrades to the wastewater network, and further modelling may be required as part of the planning process"</i>.</p> <p>Increased pressure on wastewater treatment has the potential to be a long-term and potentially permanent significant effect.</p>

16 Cumulative effects assessment

16.1 About this chapter

- 16.1.1 Cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the Newcastle-under-Lyme Local Plan and assessed alongside known existing underlying trends and other plan and programmes.
- 16.1.2 Cumulative effects are different from effects that occur alone. Alone, the Local Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.
- 16.1.3 **Table 16.1** summarises the residual effects identified for each of the SEA topics (as set out in **Chapters 7-15**) and presents the likely cumulative effects of the Local Plan when considering these alongside other plans and programmes as well as national trends.

Table 16.1: Cumulative effects assessment of the Newcastle-under-Lyme Local Plan

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
Air	<ul style="list-style-type: none"> Reduction in air quality Increased pollutant emissions 	<p>Nationally, measures to improve air quality are in place and continue to be prioritised by the UK government, which includes proposals to ban sales of petrol and diesel cars by 2035.</p> <p>Local and national policy promotes the improvement of public transport, pedestrian and cycle networks which would be likely to help reduce reliance on private car use. Despite this, it is likely that many residents within Newcastle-under-Lyme, particularly in the more rural settlements, will rely on cars for travel, to some extent.</p> <p>The Staffordshire Local Transport Plan will continue to encourage and facilitate sustainable modes of travel and manage and maintain local roads and footways. Air quality in the borough is improving, with the Council proposing to revoke one of the four AQMAs, AQMA 'No.4 Little Madeley', that has been compliant with air quality objectives for the previous five years.</p> <p>The introduction of 8,000 dwellings and 63ha of employment floorspace under the Local Plan is likely to increase energy demands, congestion and traffic flows with population growth, increasing pollutant emissions, with implications for air quality, residents and biodiversity particularly within proximity to main roads.</p> <p>Overall, the Plan will likely result in a long-term but potentially temporary significant cumulative adverse effect on air quality, which could result in secondary effects such as for the health of residents.</p>
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Threats or pressures to European sites Threats or pressures to nationally designated biodiversity sites Threats or pressures to locally designated and non-statutory biodiversity or geodiversity sites Loss or degradation of habitats of principal importance and ancient woodland Impacts on the ecological network 	<p>Newcastle-under-Lyme supports a range of nationally and locally designated biodiversity sites, including nationally designated SSSIs and locally designated LNRs and sites of biological importance, in addition to a range of priority habitats including ancient woodland.</p> <p>Biodiversity assets including European, national and local designations will continue to benefit from the objectives and measures set out in the Local Plan policies and the Staffordshire Biodiversity Action Plan including species action plans and habitat action plans to restore, protect, and enhance important features.</p> <p>Although the Plan aims to maintain and enhance biodiversity sites and includes various green infrastructure provisions, alongside mandatory 10% biodiversity net gain (BNG), there is potential for the proposed development to adversely affect some biodiversity, flora and fauna features when considered together at a landscape scale. Site-based approaches to nature conservation can fail to identify strategic landscape ecological considerations. The background trends indicate an overall picture of habitat losses and reduction in species diversity in the UK.</p> <p>Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network.</p>

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
Climatic factors	<ul style="list-style-type: none"> Increased greenhouse gas (GHG) emissions Loss of multi-functional green infrastructure (GI) 	<p>The Local Plan sets out a range of policies which focus on topics such as sustainable design, low carbon or renewable energy sources, sustainable transport and enhancements to the GI network.</p> <p>Despite these policies, it is likely there will be a cumulative increase in GHG emissions during occupation of new development including those associated with increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. Overall, the Local Plan could potentially result in a cumulative adverse effect on climate change which may lead to secondary effects such as flood risk, particularly along Lyme Brook, threats to the health and safety of residents and possibly the supply of water across the Plan area. This issue requires careful monitoring, and the findings and recommendations of the Staffordshire Climate Change Action Plan 2021-2025 should be actioned and monitored wherever possible.</p> <p>Development associated with the Local Plan will result in the loss of greenfield land and associated GI to some extent, however national policy and mitigating Local Plan policies will be expected to protect the wider GI network and lead to enhancements in the longer term.</p> <p>It should be noted that the Future Homes Standard will come into effect in 2025 and apply to all new developments, this will be accompanied by changes to Parts L (energy) and F (ventilation) of the Building Regulations. The Future Homes Standard will seek to ensure that new homes are future-proofed with low-carbon heating systems and high levels of energy efficiency. At the time of writing, it is understood that in December 2023 the government issued a Homes and Buildings Standards consultation, confirming that all new homes will be equipped with low-carbon heating and air source heat pumps. The necessary legislation is expected to be introduced in 2024, ahead of implementation in 2025.</p>
Cultural heritage	<ul style="list-style-type: none"> Impact on heritage assets 	<p>Newcastle-under-Lyme has a range of designated and non-designated historic features. Development proposed within the Local Plan would not be expected to cause significant harm to designated heritage assets and the Plan includes a number of policies which seek to conserve and enhance the historic environment and the distinctive character.</p>
Human health	<ul style="list-style-type: none"> Limited sustainable access to healthcare/leisure facilities and services Exposure to air/noise pollution (from AQMA/main road) 	<p>The health of residents within Newcastle-under-Lyme is generally good. However, the rural nature of the borough means that many site end users will be situated further away from healthcare facilities than is recommended to support sustainable communities, with potential for restricted access to essential and emergency healthcare with a likely reliance on private car use to reach the nearest facilities. Pressure on healthcare facilities is also likely to increase as the population rises, and ages. This could especially present</p>

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
	<ul style="list-style-type: none"> Limited access to public greenspace Limited access to public greenspace Limited access to PRow or cycle network 	<p>issues when considering the lack of hospitals within the borough. Overall, short, medium, and potentially long-term adverse effects on human health are likely to remain within the Plan period.</p> <p>Air and noise pollution associated with road traffic and AQMAs can have adverse implications for health. Although various Local Plan policies seek to minimise exposure to pollution, the development proposed may lead to a cumulative adverse effect on air quality as discussed in the 'air' section above.</p> <p>Many of the policies would be expected to mitigate any loss or lack of access to public greenspace, as well as creating additional provision for new greenspaces. Various Local Plan policies also seek to provide a range of open spaces and improve the borough's walking and cycling networks, within new sites and relating to existing sites. This is likely to result in positive effects in relation to the promotion of healthy lifestyles and provision of a range of open spaces, recreational facilities and pedestrian / cycling networks for new and existing residents.</p>
Landscape	<ul style="list-style-type: none"> Alteration of landscape character Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt Alteration of views Increased risk of urbanization of the countryside and coalescence Loss of tranquility Threats to important trees 	<p>Development proposed in areas with distinctive landscape characteristics is likely to alter the surrounding landscape character, particularly as a large number of sites are located on previously undeveloped land surrounding rural settlements. The Local Plan seeks to direct development towards previously developed land where possible, although to meet the identified housing requirements, a proportion of growth within the Plan is located on previously undeveloped land, equating to approximately 342ha.</p> <p>Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquility and associated indicators such as dark skies.</p> <p>Various Local Plan policies aim to protect and, where appropriate, enhance the local character and distinctiveness of Newcastle-under-Lyme's landscape through encouraging sensitive design and ensuring that new development proposals have regard to the findings of the published LCSA. However, some allocations lie within areas identified as being of 'high' sensitivity to development, and areas which have a 'strong' or 'moderate' overall contribution to the purposes of the Green Belt. In such areas, the landscape is unlikely to be able to accommodate new development without significant change.</p> <p>Despite the aims of the Local Plan policies to create new, high quality neighbourhoods with in line with landscape and townscape character, there will be an inevitable cumulative loss of rural character associated with urban sprawl and coalescence of settlements. Where a large amount of development is located on previously</p>

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
		<p>undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside.</p> <p>Although a number of development sites coincide or lie adjacent to trees with TPO status, the Local Plan policies are likely to lead to the retainment, conservation and enhancement of these assets.</p>
Population and material assets	<ul style="list-style-type: none"> • Provision of housing to meet local need • Provision of employment opportunities • Access to, and demand on, local services and facilities • Improved community cohesion • Increased household waste generation • Impacts on mineral resources 	<p>The Local Plan is likely to have a positive cumulative effect on the population and the economy, due to the provision of new homes and new jobs to meet the varied needs of the community. This includes jobs delivered through the development of employment sites, as well as jobs that may result from the development of new local centres within residential-led sites. Although issues with housing affordability are likely to continue with Newcastle-under-Lyme and nationally, the Plan will deliver affordable housing and a range of type, tenure and size of homes in line with the identified housing needs.</p> <p>Local and national policy promotes the improvement and integration of public transport, and Local Plan policies seek to improve travel choice and encourage sustainable modes of transport, including public transport, pedestrian and cycle networks. However, many residents in rural areas are likely to rely on private car use for travel, and an increased population may lead to greater pressure on the capacity of key services. A negative and potentially temporary cumulative effect would be expected in terms of accessibility.</p> <p>The Local Plan would be likely to have a positive cumulative effect on social cohesion, due to the provision of social infrastructure and greenspace for recreational activity. The co-location of community facilities and improvements to sustainable transport methods is also likely to promote community integration.</p> <p>The levels of growth set out in the Local Plan are likely to increase household waste generation over the Plan period. Although recycling rates are increasing on a national scale, it is unlikely this will help to significantly decrease waste generation within the Plan area. A long-term permanent negative cumulative effect is expected for waste.</p> <p>The majority of allocated sites coincide with Mineral Safeguarding Areas, which may hinder future potential for mineral extraction. However, the Staffordshire Minerals Local Plan¹⁷³ sets out a strategy to protect mineral resources from unnecessary sterilisation, which is likely to mitigate any potential adverse impacts.</p>

¹⁷³ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Documents/The-Minerals-Local-Plan-for-Staffordshire-2015-2030.PDF> [Date accessed: 28/06/24]

SEA topic	Identified impacts of the Local Plan	Identified cumulative effect
Soil	<ul style="list-style-type: none"> Loss of soil resources and BMV land Impact on ecosystem services 	<p>Nationally, rates of soil erosion are increasing. Soil is a non-renewable resource, which performs a number of important ecosystem services and supports a diverse range of habitats. Although Local Plan policies are expected to mitigate some impacts on the loss of soil biome through GI provision, and aim to firstly direct development to areas of previously developed land, the rural nature of the borough has led to the allocation of sites on greenfield land, including some high quality agricultural land. The proposed site allocations are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, and up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services.</p>
Water	<ul style="list-style-type: none"> Fluvial and surface water flood risk Reduction in water quality and ecosystem services Increase demand for water and wastewater management 	<p>Regarding flood risk, national policies and guidance in combination with various Local Plan policies will help to ensure development proposals do not exacerbate flood risk in the Plan area. Buildings will be located away from areas of flood risk wherever possible, and SuDS and GI will be used to ensure surface water drainage replicates that of greenfield land.</p> <p>The increased population in the Plan area would be expected to increase demand on water supply and management. The WCS (2024)¹⁷⁴ indicates that Severn Trent Water do not expect water supply infrastructure to be a constraint to development within Newcastle-under-Lyme, and water efficiency is increasing nationally. Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the RBMP, WRMP and CAMS in line with the EU Water Framework Directive.</p> <p>Development within the allocated sites has potential to lead to an increased risk of watercourse and groundwater contamination. The WCS (2024)¹⁷⁵ has identified potential impacts for downstream water quality as a result of growth within the Plan area. In combination with climate change and increased storm events, this is likely to lead to increased potential for overflows of untreated sewage and storm water into nearby waterbodies.</p> <p>A long-term cumulative adverse effect has been identified in terms of water quality.</p>

¹⁷⁴ JBA Consulting (2024) Stage 2 Water Cycle Study, Newcastle-under-Lyme. Draft Report, July 2024. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

¹⁷⁵ Ibid

17 Monitoring

17.1 Context

17.1.1 Regulation 17 of the SEA Regulations states *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*.

17.1.2 The purpose of monitoring is to measure the environmental effects of the Plan as well as its success against its objectives. However, monitoring can place a heavy burden on financial and human resources, and it may therefore be practical to focus on monitoring residual adverse effects and to build on existing monitoring systems.

17.1.3 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and if so, are these within acceptable limits or is remedial action required?

17.2 Monitoring proposals

17.2.1 Monitoring proposals are set out in **Table 17.1**.

Table 17.1: *Proposals for monitoring adverse sustainability impacts of the Newcastle-under-Lyme Local Plan*

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Air	AQMAs	Annually, Plan area wide	Decrease
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of Planning Approvals granted contrary to the advice of Natural England or Staffordshire Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Renewable energy generation	Annually, Plan area wide	Increase
Climatic factors	Fluvial flood risk along Lyme Brook	Annually, Plan area wide	Decrease

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Climatic factors	Surface water flood risk within Newcastle-under-Lyme and Kidsgrove	Annually, Plan area wide	Decrease
Cultural heritage	Number of Conservation Area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP Surgeries	Annually, Plan area wide	Increase
Landscape	Quantity of development in the open countryside	Annually, Plan area wide	Zero
Landscape	Change in tranquility in the open countryside	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Newcastle-under-Lyme within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste generation	Annually, Plan area wide	Decrease
Population and material assets	Loss of Mineral Safeguarding Areas	Annually, Plan area wide	Zero
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
Soil	Number of dwellings built on BMV land (Grades 1, 2 or 3a ALC)	Annually, Plan area wide	Decrease
Water	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero
Water	Quality of watercourses	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

18 How the SA has influenced the Plan

18.1 The role of the SA

- 18.1.1 The SA has been an influential tool throughout the plan making process to date. It works on an iterative basis. The plan makers identify various options at different stages of the plan making process which are subsequently appraised through the SA process using the methodology in **Chapter 4**.
- 18.1.2 As stated in the Publication Version of the Local Plan, the SA findings have been used to help inform the Local Plan during its preparation; this includes refinements to policy wording, developing development distribution options and site options through to the final proposals set out in the Local Plan. The draft Local Plan Site Selection Report¹⁷⁶ also outlines the step-by-step site selection process, which includes consideration of the SA following the selection of reasonable alternative sites.
- 18.1.3 The process of appraisal is sequential in nature: an assessment of impacts is made, the mitigation hierarchy is applied, and the assessment of effects is revisited, leading to the identification of residual effects. The mitigation hierarchy is an important element of the assessment process. It considers firstly if the identified adverse effect can be avoided and if not, whether it can be adequately mitigated to reduce the effect.
- 18.1.4 SA is necessarily a high-level assessment process, often using secondary data at a scale which is plan-based to make assessments about smaller-scale sites. This can introduce uncertainty to the process (see assumptions and limitations in **Chapter 4** and **Appendix E**). The application of the precautionary principle means that when doubt prevails, a worst-case scenario is identified.
- 18.1.5 The general picture of how development takes place in the UK is either through what is loosely known as (1) an appeal-led system (unplanned development for which permission is secured on appeal to the Planning Inspectorate) or (2) a plan-led system. Paragraph 15 of the NPPF is clear that “*the planning system should be genuinely plan-led*”.
- 18.1.6 The likely evolution of the baseline without the Plan (see **Table 3.1**) shows that there are already a number of important trends, some of which are negative in nature. These include matters such as air quality, GHG emissions and flood risk; events associated with a changing climate. The table suggests that these are likely to continue without the Plan, which, for the purposes of the assessment, is the so-called ‘appeal-led’ system.

18.2 Recommendations

- 18.2.1 Recommendations made throughout the SA process have been fed back to NuLBC to assist their decision making as the Local Plan has been developed. This includes recommendations to enhance the draft policies and strategic objectives for the Plan set out in **Table 18.1** (also see Appendix E of the Regulation 18 SA). Further recommendations following the Regulation 19 stage have been set out in **Table 18.2**.

¹⁷⁶ NuLBC (2023) First Draft Local Plan Site Selection Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/1857/site-selection-interim-report-2023-> [Date accessed: 02/07/24]

- 18.2.2 The recommendations set out measures to mitigate some of the potential adverse effects that had been identified during the SA process. In many cases, recommendations or suggested enhancements to policies within the Local Plan were incorporated into the final versions of the policies.
- 18.2.3 Most notably, the outcomes of the SA in terms of reasonable alternative site options have been considered in the Council's site assessment processes, ensuring that the sustainability outcomes for individual sites have been considered prior to allocations being made.

Table 18.1: Summary of recommendations made in the SA process and actions taken by NuLBC

Local Plan section	Recommendations	Action taken / NuLBC response
Evidence for climate change (SA1) and flooding (SA5)	It is recommended that the potential impacts of climate change and flood risk on development sites is considered through a Level 2 SFRA.	The emerging update to the SFRA for 2024 will provide updated information to inform the Plan with regard to flood risk and climate change.
Evidence for water (SA6)	The Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the Plan area, with reference to the Water Cycle Study.	The emerging WCS (2024) provides updated information to inform the Plan with regard to water resources and wastewater infrastructure and recommendations to ensure no detrimental effects on the water environment as a result of the Plan.
Vision – cultural heritage (SA7)	It is recommended that wording to "conserve and enhance" cultural heritage is used within the Vision to ensure this is in alignment with the NPPF.	The vision has been amended to take account of this recommendation.
Strategic Objectives – biodiversity (SA3)	It is recommended that the Strategic Objectives should clearly set out the Council's intention to conserve and enhance the quality and extent of green and blue infrastructure in the borough, and recognise the multi-functional benefits of doing so, encouraging development proposals to pursue nature-based solutions where possible.	Strategic Objective SO IX (9) has been amended to reflect the wording recommended.
Strategic Objectives – cultural heritage (SA7)	It is recommended that the Strategic Objectives are revised to ensure that reference is made to the conservation and enhancement of the borough's cultural heritage assets, to ensure that a positive strategy for the historic environment is pursued through the Local Plan.	Strategic Objective XX (13) has been added to ensure the protection and enhancement of the borough's historic environment.
Policy HOU11 - landscape (SA8)	It is recommended that stronger wording regarding the conservation of the landscape character is included in Policy	Policy HOU11 (criteria B) makes reference to the character and appearance of the surrounding area.

Local Plan section	Recommendations	Action taken / NuLBC response
	HOU11, reflecting the wording used in the NPPF.	
Policy RET1 - transport and accessibility (SA11)	Policy RET1 could be strengthened through ensuring that permitted retail/leisure developments outside of the defined centres are accessible via public transport and active travel links.	Additional text has been added to RET 1, criterion 5 to make reference to accessibility via public transport and active travel linkages
Policy RET5 – cultural heritage (SA7)	Policy RET5 could be enhanced through including stronger wording surrounding the town centre’s character and how measures could conserve and enhance the local character.	Text is included in policy RET5, criterion d to refer to conserving and enhancing the town centre character.
Policy EMP3 – landscape (SA8)	Policy EMP3 could be enhanced through including stronger reference to the conservation and enhancement of the landscape character.	Policy EMP3, point 1(a) refers to the type and scale of the proposal being appropriate to its location.
Policy SE11 – biodiversity (SA3) and landscape (SA8)	Policy SE11 could be enhanced through ensuring that appropriate, and preferably native / locally important, species are planted through any new schemes in suitable locations, informed by a qualified ecologist / arboriculturalist. This will help to ensure ‘the right tree in the right place’ ¹⁷⁷ .	Criterion 1 of policy SE11: Trees, hedgerows and woodland refers to the need for an arboricultural impact assessment and / or a hedgerow surveys.
Policy AB15 and Policy AB33 – water (SA6)	It is recommended that the wording regarding “ <i>an appropriate distance</i> ” from the sewer is more clearly defined for sites AB15 and AB33.	Reference to an ‘appropriate distance’ is considered suitable and is reflective of a need for further detail to be established at planning application stage.
Policy CT20, Policy KL13 and Policy MD29 – biodiversity (SA3)	It is recommended that development within site CT20, site KL13, site MD29 is directed away from areas of the site which comprise high habitat distinctiveness.	As the Plan is intended to be read as a whole, alongside policy SA1 ‘general requirements’ should ensure that this matter is appropriately considered at planning application stage.
Policy CT20 – landscape (SA8) and health (SA11)	It is recommended that clearer wording is attributed to “ <i>agent of change mitigation may be required at source</i> ” to mitigate noise impacts on or from site CT20.	Criterion 5 of policy CT20 refers to consider the relationship of the site to surrounding development in respect of amenity impacts.
Policy KL13 – biodiversity (SA3)	Policy KL13 may benefit from stronger wording to define the word “ <i>appropriate</i> ” with regards to buffers surrounding SBI and BAS sites.	The reference to appropriate is considered suitable as this is a matter that should be determined at planning application stage.
Policy SP11 – transport and accessibility (SA11)	It is recommended that policy for the four SP11 parcels defines the size of land required for a new primary school.	Reference to the school is considered appropriate at the Plan stage. Further information would be derived when the exact requirements are identified through a future planning application / design code / masterplan.

¹⁷⁷ Forestry Commission (2022) Urban Tree Manual: The Right Tree in the Right Place for a Resilient Future. Available at: <https://www.forestryresearch.gov.uk/tools-and-resources/ftfr/urban-tree-manual/> [Date accessed: 31/05/24]

19 Conclusions

19.1 Residual effects following mitigation

- 19.1.1 The SA has assessed the site allocations and policies proposed in the Local Plan using the methodology in **Chapter 4**, and for site assessments further receptor-based methodology and assumptions as set out in **Appendix E**. A range of sustainability effects have been identified, which are highlighted throughout the policy and site assessments in **Appendices G and J**, with residual positive, negligible and negative effects summarised and discussed in **Chapters 7 to 15**.
- 19.1.2 Proposals in the Newcastle-under-Lyme Local Plan vary in terms of their sustainability performance with likely positive effects expected on some SA Objectives and adverse effects on others. The SA has identified likely sustainability effects of Local Plan proposals alone and in-combination.
- 19.1.3 The Plan is anticipated to result in a range of positive effects on sustainability, which are summarised in **Table 19.1**. This includes positive effects associated with the provision of homes and jobs to meet the varying needs of the population, as well as provision of and accessibility to GI, public greenspace and active travel infrastructure. The Plan is likely to lead to positive effects overall with regard to wellbeing, and promoting cohesive and sustainable communities.
- 19.1.4 The mitigation proposals presented in the Plan provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.
- 19.1.5 The identified residual adverse effects (see **Table 19.2**) are generally minor, although some are associated with greater levels of uncertainty. In some cases, for example residual effects associated with household waste, landscape and biodiversity; these have been derived through the application of the precautionary principle owing to this uncertainty and in some cases lack of information to inform the assessments.
- 19.1.6 Some identified effects are greater in magnitude, for example residual adverse effects associated with air quality and climate change. These require careful attention outside of and beyond the Local Plan; notwithstanding such uncertainties, these aspects are included in the recommendations for monitoring. Whilst the Plan includes positive mitigation measures, the Plan alone cannot address these matters in their entirety as these are effects that are predicted to happen with or without the Plan. The Plan includes measures to reduce these effects, however, when considered cumulatively, a residual adverse effect is still likely to occur.

Table 19.1: Likely residual positive sustainability effects of the Newcastle-under-Lyme Local Plan

Summary of residual positive effects	
1	<p>Multi-functional green infrastructure network</p> <p>The Local Plan promotes the conservation and enhancement of multi-functional GI across the borough, through encouraging development proposals to increase connectivity of the wider green and blue infrastructure network.</p> <p>Although the proposed development within the Local Plan will result in the loss of greenfield land and associated GI to some extent, the Local Plan policies are expected to mitigate and re-compensate this loss of GI, resulting in a positive effect on GI provision in the longer term.</p>
	<p>Access to public greenspace</p> <p>Various Local Plan policies aim to provide a range of open spaces, sport facilities and recreational spaces for site end users, and compensate for any facilities lost to development. This is expected to help facilitate healthy and active lifestyles and supplement the borough's existing recreational resource.</p>
3	<p>Access to PRow and cycle networks</p> <p>A large number of site allocations are expected to link to existing PRow routes which have good coverage across the borough, and some allocations are located in proximity to cycle paths. Various Local Plan policies seek to create permeable neighbourhoods which promote cycling and walking, which is likely to improve the coverage of, and accessibility to the pedestrian and cycle networks across the borough. This would be expected to encourage residents to participate in physical exercise and active travel, with benefits to health and wellbeing.</p>
4	<p>Provision of housing to meet local need</p> <p>In order to meet the identified housing need, the Local Plan proposes to deliver 8,000 new dwellings within the Plan period. Policies set out in the Plan include various requirements to ensure the provision of an appropriate mix of housing types and tenures that will address the needs of different groups including those with specialist needs, first time home buyers, and the Gypsy and Traveller community.</p>
5	<p>Provision of employment opportunities</p> <p>The Plan seeks to deliver 63ha of employment land, exceeding the need identified in the latest HEDNA. Various Local Plan policies are also expected to improve access to employment opportunities, such as through improving sustainable transport options, and by locating employment-lead development in areas with good accessibility to the road and transport networks.</p>
6	<p>Community cohesion</p> <p>The Local Plan policies demonstrate NuLBC's commitment to enhancing community cohesion. These address various needs such meeting accommodation requirements, and safeguarding community services and facilities. The policies also encourage the careful design to co-locate new development with community facilities and open spaces in order to deliver a high-quality public realm.</p>
7	<p>Mineral resources</p> <p>Although the majority of development sites coincide with MSAs, Policy SA1 and the Staffordshire Minerals Local Plan¹⁷⁸ seek to prevent the unnecessary sterilisation of mineral resources from non-minerals development. This is expected to conserve mineral resources by ensuring that any potential impact on safeguarded minerals is avoided or minimised.</p>

¹⁷⁸ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Documents/The-Minerals-Local-Plan-for-Staffordshire-2015-2030.PDF> [Date accessed: 26/06/24]

Table 19.2: Likely residual adverse sustainability effects of the Newcastle-under-Lyme Local Plan

Summary of residual adverse effects	
1	<p>Reduction in air quality and increased pollutant emissions</p> <p>Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality.</p> <p>The policies would be expected to prevent unacceptable impacts on human health associated with air pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality as a whole.</p> <p>Over time, this adverse impact is likely to be reduced should there be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars, alongside other advances in technology.</p>
	<p>Fragmentation of the ecological network</p> <p>The Local Plan is expected to result in the loss of a significant amount of previously undeveloped land, including soil resources, habitats and ecological links between biodiversity assets.</p> <p>Fragmentation of the ecological network is likely to be a long-term significant adverse effect. Should biodiversity net gain and landscape-scale ecological enhancements be effectively implemented, there is potential for this effect to be temporary and beneficial in the long-term.</p>
3	<p>Increased greenhouse gas emissions</p> <p>Local Plan policies aim to increase uptake of sustainable transport and active travel, as well as utilising building design and construction methods to minimise the increase in greenhouse gas emissions related to development. However, the Plan is not expected to fully mitigate these impacts, particularly those related to the occupation of development.</p> <p>An increase in carbon emissions in Newcastle-under-Lyme is likely to be a long-term and permanent significant effect. However, over time, there is potential for technological advances and alternative solution to reduce this impact to some extent.</p>
	<p>Limited access to healthcare/leisure facilities and services</p> <p>A notable proportion of site allocations are located outside of the 5km sustainable target distance to an NHS hospital or over 800m from a GP surgery. Local Plan policies such as PSD6 and IN1, are likely to prevent the loss of existing healthcare facilities and improve access to facilities for some residents. However, the policies would not be expected to fully mitigate the restricted access to healthcare services for sites in more rural settlements in Newcastle-under-Lyme.</p>
5	<p>Alteration of landscape character</p> <p>Various Local Plan policies seek to ensure that development proposals maintain and improve the borough's intrinsic rural character and distinctiveness and have regard to the findings of the published LCSA. However, due to the scale of development proposed with a large proportion in previously undeveloped locations surrounding rural settlements, the development set out in the Local Plan could have the potential to alter Newcastle-under-Lyme's distinctive rural character to some extent.</p>
	<p>Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt</p> <p>Local Plan policies seek to ensure that Green Belt land will only be released for development when necessary and justified, whilst having regard to the findings of the LCSA. However, it is unlikely that these impacts could be fully mitigated particularly for allocated sites in areas identified as being of a 'high' or 'medium' sensitivity, or sites allocated in areas with a 'moderate' or 'strong' overall contribution to the purposes of the Green Belt. Within these areas, the landscape is unlikely to be able to accommodate new development without significant change.</p>

	Summary of residual adverse effects
7	<p>Alteration of views</p> <p>Whilst the Local Plan policies provide some protection of visual amenity and views, it is likely a minor residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of the sites proposed in the Local Plan.</p>
8	<p>Increased risk of urbanisation of the countryside and coalescence</p> <p>The identified need to provide housing and employment in the Plan has led to the proposed allocation of development on previously undeveloped greenfield sites at a number of locations within the Newcastle-under-Lyme. Various policies in the Local Plan seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts, and a residual adverse effect is anticipated. This includes potential for reduced separation between some settlements.</p>
9	<p>Loss of tranquility</p> <p>The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquility of the rural landscape as a consequence of increases in noise and light pollution.</p>
10	<p>Increased household waste generation</p> <p>It is difficult for the Local Plan to specifically reduce waste generation within the Plan area. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 8,000 new households is expected to increase waste production to some extent which will impact the capacity of waste management facilities.</p>
11	<p>Loss of soil resources, BMV land and ecosystem services</p> <p>The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.</p>
12	<p>Increased demand for water and wastewater management</p> <p>The increased population within the Plan area would be expected to increase demand on water infrastructure. Although the WCS indicated that Seven Trent Water does not expect water supply infrastructure to be a constraint to development, there is potential for a residual adverse effect in regard to wastewater infrastructure when planned growth is considered in-combination with an increase in sewage production and potential for storm overflow events. It is likely that further monitoring and investment to wastewater infrastructure will be required to accommodate development.</p>

19.2 Consultation and next steps

- 19.2.1 This report represents the latest stage of the SA process. As per Regulation 13 of the SEA Regulations¹⁷⁹, this Regulation 19 SA Report will be published alongside the Publication Version of the Local Plan.
- 19.2.2 A six-week period of consultation under the Town and Country Planning Act will be undertaken by NuLBC to offer individuals, businesses and other organisations an opportunity to submit representations regarding the Newcastle-under-Lyme Local Plan.
- 19.2.3 Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.

¹⁷⁹ The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 13: Consultation procedures. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/regulation/13/made> [Date accessed: 04/07/24]

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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Sustainability Appraisal of the Newcastle-under-Lyme Local Plan (2020-2040)

Regulation 19 SA Report

Volume 3 of 3: Appendices

July 2024



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Sustainability Appraisal of the Newcastle-under-Lyme Local Plan 2020-2040

Including: Strategic Environmental Assessment and
Equality Impact Assessment

Regulation 19 SA

Volume 3 of 3: Appendices

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Front Cover: The Trent and Mersey Canal, Kidsgrove, Newcastle-under-Lyme. Credit: Andrew Chisholm, Shutterstock

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Appendix J: Site-specific policy assessments

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Appendix A: SA Framework

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	Climate Change: 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.	<ul style="list-style-type: none"> Help reduce the per capita carbon footprint of Newcastle-under-Lyme? Help to facilitate and encourage the use and generation of renewable energy? Promote use of technologies and techniques to adapt to the impacts of climate change? Protect and enhance the quantity and connectivity of green and blue infrastructure assets that deliver climate change benefits? 	<ul style="list-style-type: none"> Energy efficiency of buildings and transport. Percentage of energy in the area generated from renewable sources. Greenhouse gas / carbon emissions.
2	Air: To improve air quality, creating cleaner and healthier air.	<ul style="list-style-type: none"> Reduce air pollution and help to improve air quality? Reduce pollution from traffic? Protect and enhance the quantity and connectivity of green and blue infrastructure assets that deliver air quality benefits? 	<ul style="list-style-type: none"> Development with potential to generate a significant increase in road traffic emissions or other air pollutants. Proximity to pollutants (e.g. busy roads). Proximity to AQMAs and current AQMA status.
3	Biodiversity, Flora and Fauna: Protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity.	<ul style="list-style-type: none"> Maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity designations? Ensure that there is an overall net gain in the extent and quality of biodiversity? Link up areas of fragmented habitat contribute to habitat connectivity? Increase awareness of biodiversity assets? Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver biodiversity benefits? Optimise benefits from nature? Protect and enhance ecosystem services? Protect, enhance or restore the ecological network? Protect, enhance or restore natural capital? 	<ul style="list-style-type: none"> Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. Number and diversity of European Protected Species, and NERC Act Section 41 species in the area. Area and condition of priority habitats. Area and condition of sites designated for biological and geological interest. Quantity of biodiversity net gain delivered through Defra Metric. Condition of the Local Nature Recovery Network Percentage of major developments generating overall biodiversity enhancement.

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
4	Natural Resources and Waste: To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources, ensure the efficient use of mineral resources and reduce waste.	<ul style="list-style-type: none"> Utilise previously developed, degraded and under-used land? Lead to the loss of the best and most versatile agricultural land? Maintain soil quality or help to remediate land affected by ground contamination? Lead to the loss or sterilisation of mineral resources, or affect mineral working? Encourage recycling/re-use/composting of waste? Minimise and where possible eliminate generation of waste? 	<ul style="list-style-type: none"> Number and capacity of waste management facilities. Re-use of recycled materials. Management of local authority collected waste. Agricultural Land Classification. Re-use of contaminated land. Mineral Safeguarding Areas. The amount of soil sealed.
5	Flooding: To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems (SuDS).	<ul style="list-style-type: none"> Avoid development in areas at high risk of flooding? Reduce the risk of fluvial, surface water, groundwater and sewer flooding to existing and new developments? Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver climate change adaptation and flood-relief benefits? Promote the use of SuDS? Help to reduce the rate of run-off from new developments? 	<ul style="list-style-type: none"> Number of properties at risk of flooding. Surface water flood risk. Area and connectivity of GI. Implementation of adaptive techniques, such as SUDS and passive heating/cooling.
6	Water: To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive	<ul style="list-style-type: none"> Maintain and improve water quality to WFD standards? Ensure efficient use of water and encourage water to be stored for re-use? Reduce the demand for water and maintain a sufficient water supply? Reduce pollution of groundwater, watercourses and rivers from run-off, including nitrates/phosphates? 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? Deliver no net loss of the water supply? Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver water quality benefits? 	<ul style="list-style-type: none"> Proximity to watercourses with poor quality status. Quality of water bodies in or adjacent to sites. Percentage change in pollution incidents. Number of developments given planning permission contrary to EA advice relating to river water quality or the protection of groundwater. Run-off rates and water retention infrastructure
7	Cultural Heritage: To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings.	<ul style="list-style-type: none"> Conserve and enhance features of architectural or historic interest and, where necessary, encourage their conservation and renewal? Conserve and enhance archaeological sites/remains? Conserve and enhance the setting of cultural heritage assets? Improve the energy efficiency of historic buildings? Improve access to the borough's cultural and historical assets? Promote the sensitive re-use of important buildings? Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver cultural heritage benefits? 	<ul style="list-style-type: none"> Number and type of features and areas of historic designations in the Plan area. Statutory and non-statutory sites in the Historic Environment Record (HER). Number and condition of historic assets on the Heritage at Risk register. Condition of locally important buildings and structures.

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
8	Landscape: To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.	<ul style="list-style-type: none"> • Ensure new development is in keeping with the surrounding character and distinctiveness? • Safeguard and enhance local distinctiveness and identity? • Protect and enhance visual amenity, including light and noise pollution? • Improve the appearance of degraded landscapes/ townscapes? • Lead to coalescence of settlements and/or urban sprawl? • Prevent urban sprawl by keeping land permanently open? • Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver landscape and townscape benefits? 	<ul style="list-style-type: none"> • National Character Area. • Tranquillity rating of area. • Re-use of derelict buildings or re-use of buildings in a prominent location. • Landscape sensitivity.
9	Health and Wellbeing: To increase life expectancy and improve the health and mental wellbeing of the population overall; and to maintain and enhance the quality, accessibility and connectivity of open space and blue-green infrastructure.	<ul style="list-style-type: none"> • Help to improve the overall health and mental wellbeing of the community? • Encourage healthy lifestyles? • Improve sustainable access for all to health, leisure and recreational facilities? • Encourage access to green space? • Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver health benefits? • Help the community to remain independent and aid the elderly, those with ill health and those with a disability? 	<ul style="list-style-type: none"> • Area of new greenspace created per capita. • Provision and accessibility of open greenspace and GI. • Travel time by public transport to nearest health centre and sports facilities. • Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres. • Hectares of accessible open space per 1,000 population.
10	Equality: To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, including availability of a warm, safe home are available to all sectors of the population with particular emphasis on deprived neighbourhoods.	<ul style="list-style-type: none"> • Help achieve life-long learning and increase learning participation and adult education? • Enable communities to influence the decisions that affect their neighbourhoods and quality of life and foster good community relations? • Eliminate unlawful discrimination, victimisation and harassment? • Reduce crime and the fear of crime? • Ensure sustainable accessibility to community facilities? • Help to address the issues of deprivation and poverty? • Is there any negative impact on individuals or groups in the community including consideration of age, disability, gender, race, religion, gender re-assignment, maternity, sexual orientation, marriage and civil partnership, and human rights? • Provide a mix of good-quality and affordable housing, including homes that are suitable for first-time buyers, university students, single parents, families, the elderly and accommodation for gypsies & travellers? 	<ul style="list-style-type: none"> • No. of people with NVQ2 qualifications. • Crime Deprivation Index. • Education, Skills & Training Deprivation Index. • Availability of libraries. • Index of Multiple Deprivation • Varied housing mix, including affordable housing and care homes. • Proportion of affordable housing.

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
11	Transport and Accessibility: To reduce the need to travel while increasing transport choice including the promotion of safe and efficient public transport and active travel options at the heart of a transport network that provides accessibility for all.	<ul style="list-style-type: none"> • Reduce the need to travel and/or reduce travel time? • Reduce the need to travel by private vehicle? • Reduce existing congestion and mitigate future increases? • Improve the choice of transport available? • Provide adequate means of access by a range of sustainable transport modes to promote active travel (i.e., walking/cycling/public transport)? • Provide safe walking and cycling routes? • Improve access to key services and facilities for all, including education, training opportunities and employment? 	<ul style="list-style-type: none"> • Distance to place of work, education and training. • Distance to local amenities and key services. • Distance to existing or proposed public transport links. • Frequency of public transport services. • Proximity and connectivity of walking and cycling links. • Distance to bus stop or train station.
12	Economy: To protect and enhance the vitality and viability of centres and ensure the provision of a range of employment land and premises that meets the needs of the business community and provides retail opportunities for local communities.	<ul style="list-style-type: none"> • Increase accessibility of suitable employment within Newcastle-under-Lyme? • Provide for the needs of the economy, especially local businesses, and encourage business start-ups in the area? • Support the health of established centres? • Protect and create jobs, and encourage local jobs to be filled by local people? • Encourage the provision of higher paid employment? • Support high streets and businesses in a post Covid-19 environment? • Encourage diversity and quality of employment types, including rural diversification? • Protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver benefits to the economy? 	<ul style="list-style-type: none"> • Number of residents working within Newcastle-under-Lyme. • Number of employment opportunities in professional occupations. • Number of new business start-ups. • Total amount of employment land. • Number of vacant units in strategic centres. • Amount of additional retail, office and leisure floorspace completed in established centres.

Appendix B: Policies, Plans and Programmes (PPP) Review

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B.1 International plans and programmes

Table B.1.1: *International plans and programmes*

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Paris Agreement (2016) ¹	Adopted by 196 parties to limit global warming to well below 2, preferably 1.5 degrees Celsius, compared to pre-industrial levels.	Climate change mitigation
Aarhus Convention (1998) ²	Guarantees the access to information, public participation in decision making and access to justice in environmental matters.	Transparency of environmental data
Air Quality Framework Directive 2015/1480/EC ³	Amends several annexes to Directives 2004/107/EC and 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.	Improve air quality
The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention) ⁴	The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage.	Transparency of environmental data
Bern Convention on the Conservation of Migratory Species of Wild Animals (1979) ⁵	Aims to promote co-operation between the signatory countries in order to conserve wild flora and fauna and their natural habitats and to protect endangered migratory species.	Improve biodiversity

1 United Nations (2016). Paris Agreement. Available at: <https://www.un.org/en/climatechange/paris-agreement> [Date accessed: 04/06/24]

2 United Nations Economic Commission for Europe (1998). Aarhus Convention. Available at: <https://unece.org/environment-policy/public-participation/aarhus-convention/text> [Date accessed: 04/06/24]

3 Food and Agriculture organization of the United Nations (2015). Air Quality Framework Directive 2015/1480/EC. Available at: <https://www.fao.org/faolex/results/details/en/c/LEX-FAOC163552/#:~:text=This%20Directive%20lays%20down%20some,aromatic%20hydrocarbons%20in%20ambient%20air.> [Date accessed: 04/06/24]

4 Council of Europe (1985). The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention). Available at: <https://www.coe.int/en/web/culture-and-heritage/granada-convention#:~:text=The%20main%20purpose%20of%20the,co%20operation%20among%20the%20Parties.> [Date accessed: 04/06/24]

5 European Union (2020) Bern Convention 1979. Bern Convention on the Conservation of Migratory Species of Wild Animals. Available at: <https://eur-lex.europa.eu/EN/legal-content/summary/bern-convention.html#:~:text=The%20convention%2C%20adopted%20at%20Bern,to%20protect%20endangered%20migratory%20species.> [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Bern Convention on Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EC, Habitats Directive) (1992)⁶	Aims to promote co-operation between the signatory countries in order to conserve wild flora and fauna and their natural habitats and to protect endangered migratory species.	Improve biodiversity
Convention on the Conservation of European Wildlife and Natural Habitats (1979)⁷	Aims to conserve wild flora and fauna and their natural habitats and 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.	Improve biodiversity
The Convention on Wetlands of International Importance (The Ramsar Convention) (1971)⁸	The only international mechanism for protecting sites of global importance and is thus of key conservation significance.	Transparency of environmental data
EU Birds Directive (2009/147/EC)⁹	A legal framework, binding for all Member States, for the protection of all wild birds in the EU, including their eggs, nests and habitats.	Improve biodiversity
EU Sustainable Development Strategy (2006)¹⁰	The overall aim was to identify and develop actions to a continuous long- term improvement of quality of life through the creation of sustainable communities. These should manage and use resources efficiently, tap the ecological and social innovation potential of the economy, and ensure prosperity, environmental protection and social cohesion.	Encourage sustainable waste management

6 European Commission (2020) Bern Convention 1992. Bern Convention on Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EC, Habitats Directive) Available at: https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en#. [Date accessed: 04/06/24]

7 European Union (2020) Convention on the Conservation of European Wildlife and Natural Habitats 1979. Available at: <https://eur-lex.europa.eu/EN/legal-content/summary/bern-convention.html#:~:text=The%20convention%2C%20adopted%20at%20Bern,to%20protect%20endangered%20migratory%20species>. [Date accessed: 04/06/24]

8 Ramsar (2023). The Convention on Wetlands of International Importance (The Ramsar Convention) (1971). Available at: <https://www.ramsar.org/about-convention-wetlands> [Date accessed: 04/06/24]

9 European Commission. EU Birds Directive (2009/147/EC). Available at: https://environment.ec.europa.eu/topics/nature-and-biodiversity/birds-directive_en#:~:text=It%20was%20amended%20in%202009,protect%20and%20restore%20their%20habitats. [Date accessed: 04/06/24]

10 European Environment Agency. EU Sustainable Development Strategy (2006). Available at: <https://www.eea.europa.eu/policy-documents/renewed-eu-strategy-for-sustainable-development> [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
European Commission Biodiversity Strategy (2012) ¹¹	A comprehensive, ambitious and long-term plan to protect nature and reverse the degradation of ecosystems. The strategy aims to put Europe's biodiversity on a path to recovery by 2030.	Improve biodiversity
The European Convention on the Protection of Archaeological Heritage (Valetta Convention) ¹²	Sets guidelines for the funding of excavation and research work and 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.	Heritage/cultural conservation
European Landscape Convention (2000) ¹³	Promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues.	Strengthen the quality of landscapes
The Floods Directive (2007/60/EC) ¹⁴	A framework for the assessment and management of flood risks to reduce the negative consequences of flooding on human health, economic activities, the environment and cultural heritage in the European Union.	Development management in flood risk areas
Groundwater Daughter Directive (2006/118/EC) ¹⁵	Designed to prevent and combat groundwater pollution in the European Union.	Improve water quality
Habitat and Species Directive 92/43/EEC (1992) ¹⁶	Ensures the conservation of a wide range of rare, threatened or endemic animal and plant species.	Improve biodiversity
Kyoto Protocol (1997) ¹⁷	Commits industrialized countries and economies in transition to limit and reduce greenhouse gas (GHG) emissions in accordance with agreed individual targets.	Climate change mitigation

11 European Commission. European Commission Biodiversity Strategy (2012). Available at: https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en [Date accessed: 04/06/24]

12 Council of Europe. The European Convention on the Protection of Archaeological Heritage (Valetta Convention, 1992). Available at: <https://www.coe.int/en/web/culture-and-heritage/valletta-convention> [Date accessed: 04/06/24]

13 Council of Europe. European Landscape Convention (2000). Available at: <https://www.coe.int/en/web/landscape> [Date accessed: 04/06/24]

14 European Environment Agency. The Floods Directive (2007/60/EC). Available at: <https://www.eea.europa.eu/policy-documents/directive-2007-60-ec-of> [Date accessed: 04/06/24]

15 European Environment Agency. Groundwater Daughter Directive (2006/118/EC). Available at: <https://www.eea.europa.eu/policy-documents/groundwater-directive-gwd-2006-118-ec> [Date accessed: 04/06/24]

16 European Commission. Habitat and Species Directive 92/43/EEC (1992) Available at: https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en#:~:text=The%20overall%20objective%20is%20to,thrive%20over%20the%20long%2Dterm. [Date accessed: 04/06/24]

17 United Nations. Kyoto Protocol (1997). Available at: https://unfccc.int/kyoto_protocol [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Nitrates Directive (91/676/EEC)¹⁸	Aims to protect water quality across Europe by preventing nitrates from agricultural sources polluting ground and surface waters and by promoting the use of good farming practices.	Improve water quality
Water Framework Directive (2000/60/EC)¹⁹	An EU directive which commits European Union member states to achieve good qualitative and quantitative status of all water bodies by 2015.	Improve water quality
(Wild) Bird Directive 79/409/EEC (1979)²⁰	Member states must ensure that all bird species have a sufficient 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.	Improve biodiversity
World Heritage Convention (1972)²¹	The primary mission of the Convention is to identify and protect the world's natural and cultural heritage considered to be of Outstanding Universal Value.	Transparency of environmental data
Urban Waste Treatment Directive (1991)²²	Concerns collection, treatment and discharge of urban wastewater and the treatment and discharge of waste water from certain industrial sectors.	Improve water quality

¹⁸ European Commission. Nitrates Directive (91/676/EEC). Available at:

https://environment.ec.europa.eu/topics/water/nitrates_en#:~:text=The%20Nitrates%20Directive%20requires%20EU,50%20mg%2F%20of%20nitrates. [Date accessed: 04/06/24]

¹⁹ Water Framework Directive 2000/60/EC. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060> [Date accessed: 04/06/24]

²⁰ (Wild) Bird Directive 79/409/EEC (1979). Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A31979L0409> [Date accessed: 04/06/24]

²¹ UNESCO. World Heritage Convention (1972). Available at: <https://whc.unesco.org/en/convention/> [Date accessed: 04/06/24]

²² Urban Waste Treatment Directive (1991). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31991L0271> [Date accessed: 04/06/24]

B.2 National plans and programmes

Table B.2.1: *National plans and programmes*

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
National Planning Policy Framework (NPPF) (2023) ²³	The revised National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied.	Encourage sustainable development
Levelling-up and Regeneration Act (2023) ²⁴	The Levelling-up and Regeneration Act provides a framework for future changes of the planning system, to incentivise the prompt building of housing sites.	Encourage sustainable development
Historic England Good Practice Advice Notes (GPAs) ²⁵	The GPAs address plan-making and decision-taking, and other issues which are important in good decision-making affecting heritage assets.	Heritage/cultural conservation
Historic England Advice Notes (HEANs) ²⁶	These are advice notes covering various planning topics in more detail and at a more practical level. They have been prepared by Historic England following public consultation.	Heritage/cultural conservation
Ancient Monuments and Archaeological Areas Act (1979) ²⁷	To make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters.	Transparency of environmental data
The Climate Change Act (2008) ²⁸	The Act requires the Government to set legally binding emissions targets ('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.	Climate change mitigation

23 DLUHC (2023). National Planning Policy Framework. December 2023. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 04/06/24]

24 HM Government (2023). Levelling-up and Regeneration Act 2023. Available at: <https://www.legislation.gov.uk/ukpga/2023/55#:~:text=An%20Act%20to%20make%20provision,for%20certain%20consents%20and%20plans%3B>

25 Historic England (2024) Good Practice Advice Notes. Available at: [https://historicengland.org.uk/advice/planning/planning-system/#:~:text=Good%20Practice%20Advice%20notes%20\(GPAs,national%20planning%20policy%20and%20guidance.](https://historicengland.org.uk/advice/planning/planning-system/#:~:text=Good%20Practice%20Advice%20notes%20(GPAs,national%20planning%20policy%20and%20guidance.) [Date accessed: 04/06/24]

26 Historic England (2024) Historic England Advice Notes. Available at: [https://historicengland.org.uk/advice/planning/planning-system/#:~:text=Good%20Practice%20Advice%20notes%20\(GPAs,national%20planning%20policy%20and%20guidance.](https://historicengland.org.uk/advice/planning/planning-system/#:~:text=Good%20Practice%20Advice%20notes%20(GPAs,national%20planning%20policy%20and%20guidance.) [Date accessed: 04/06/24]

27 Ancient Monuments and Archaeological Areas Act (1979). Available at: <https://www.legislation.gov.uk/ukpga/1979/46> [Date accessed: 04/06/24]

28 The Climate Change Act (2008). Available at: <https://www.legislation.gov.uk/ukpga/2008/27/contents> [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Conservation of Habitats and Species Regulations (2017) ²⁹	These regulations consolidated the Conservation of Habitats and 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.	Improve biodiversity
DLUHC & MHCLG (2023) CIL Guidance ³⁰	Explains what the Community Infrastructure Levy is and how it operates. The Community 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.	Ensures access to necessary facilities
DLUHC & MHCLG (2020) Neighbourhood Planning ³¹	The guidance explains the neighbourhood planning system introduced by the Localism Act, including key stages and considerations required.	Ensures sustainable community development
DESNZ (2023) National Energy Statement (EN1) ³²	Sets out national policy for energy infrastructure. It has effect on the decisions by the Infrastructure Planning Commission on applications for energy developments.	Climate change mitigation
Defra (2013) Adapting to Climate Change: Ensuring Progress in Key Sectors ³³	Ensure climate change risk management is systematically undertaken by reporting authorities and helps ensure public services and infrastructure are resilient to climate change. Monitors the level of preparedness of key sectors to climate change.	Climate change mitigation
Defra (2011) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland ³⁴	Sets out objectives and policy options to further improve air quality 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.	Improve air quality

29 Conservation of Habitats and Species Regulations (2017). Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents/made> [Date accessed: 04/06/24]

30 DLUHC & MHCLG (2024) Community Infrastructure Levy Guidance. Available at: <https://www.gov.uk/guidance/community-infrastructure-levy> [Date accessed: 04/06/24]

31 DLUHC & MHCLG (2020). Neighbourhood Planning. Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2> [Date accessed: 04/06/24]

32 Department for Energy Security and Net Zero (2023). National Energy Statement (EN1). Available at: https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf [Date accessed: 04/06/24]

33 DEFRA (2013) Adapting to Climate Change: Ensuring Progress in Key Sectors. Available at: http://data.parliament.uk/DepositedPapers/Files/DEP2013-1089/134219_Clim-Act.pdf [Date accessed: 04/06/24]

34 DEFRA (2011) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. Available at: <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england-scotland-wales-and-northern-ireland-volume-1> [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Defra (2011) Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services³⁵	A biodiversity strategy for England built on the Natural Environment White Paper. It provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade.	Improve biodiversity
Forestry Commission (2023) Thriving for the future: Forestry Commission Strategy 2023-2028³⁶	Sets out clear priorities for future policy-making, focused on protecting, improving and expanding our public and private woodlands.	Improve biodiversity
Defra (2004) Making Space for Water: Developing a new Government strategy for flood and coastal erosion risk management in England³⁷	Takes account of sustainable development and the Government's strategic priorities. Reflects on lessons learned from the flood events in recent past. Addresses the challenges and pressures we are facing over the next century such as climate change, development pressures and rising levels of flood and coastal erosion risk.	Flood risk management
Defra (2012) Noise Policy Statement for England³⁸	Aims to promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.	Improve health of residents
Defra (2004) Rural Strategy³⁹	Provides the policy framework, the tools and the evidence base to help all Government Departments, regional and local partners work together in a collaborative way to deliver more sustainable rural communities and an enhanced and enriched countryside.	Improve green infrastructure Sustainability choices made locally
Defra (2011) Safeguarding Our Soils⁴⁰	Aims to ensure all England's soils will be managed sustainably and degradation threats tackled successfully by 2030.	Improve geodiversity

35 DEFRA (2011) Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services. Available at:

<https://assets.publishing.service.gov.uk/media/5a78c263ed915d04220651ea/pb13583-biodiversity-strategy-2020-111111.pdf> [Date accessed: 04/06/24]

36 Forestry Commission (2023). Thriving for the future: Forestry Commission Strategy 2023-2028. Available at: <https://www.gov.uk/government/publications/forestry-commission-strategy-2023-2028/thriving-for-the-future-forestry-commission-strategy-2023-28#:~:text=We%20will%20develop%20with%20central,ecosystems%20which%20have%20become%20fragmented.>

[Date accessed: 04/06/24]

37 DEFRA (2004). Making Space for Water: Developing a new Government strategy for flood and coastal erosion risk management in England. Available at:

<http://www.met.reading.ac.uk/~sws00rsp/teaching/postgrad/consultation%5B1%5D.pdf> [date accessed: 04/06/24]

38 DEFRA (2012) Noise Policy Statement for England (NPSE). Available at: <https://assets.publishing.service.gov.uk/media/5a7956e0ed915d0422067947/pb13750-noise-policy.pdf> [Date accessed: 04/06/24]

39 DEFRA (2004). Rural Strategy. Available at: <https://publications.parliament.uk/pa/cm200405/cmselect/cmenvfru/408/408i.pdf> [Date accessed: 04/06/24]

40 DEFRA 2011. Safeguarding Our Soils. Available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Defra (2015) Sustainable Drainage Systems – Non- statutory Technical Standards for sustainable Drainage Systems⁴¹	Non-statutory technical standards for the design, maintenance and operation of sustainable drainage systems to drain surface water.	Flood risk management
Environment Act (2021)⁴²	Contains a range of measures to improve the quality of the local environment by giving local authorities and the Environment Agency additional powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.	Sustainability choices made locally
Defra (2018) 25 Year Environment Plan⁴³	The 25YEP sets out the government’s vision for actions to help the natural world to regain and retain good health, seeking to leave the environment in a better state than we found it.	Sustainability choices made locally Improve biodiversity
Environment improvement Plan (2023)⁴⁴	Contains actions to restore nature, tackle environmental pollution and increase the prosperity of the country, building on the 25YEP vision.	Sustainability choices made locally Improve biodiversity
Flood and Water Management Act (2010)⁴⁵	Provides better, more comprehensive management of flood risk for people, homes and businesses. Helps safeguard community groups from unaffordable rises in surface water drainage charges and protects water supplies for the consumer.	Flood risk management
Flood Risk Regulations (2009)⁴⁶	Provides the Environment Agency and local authorities with guidance on their responsibilities when preparing flood risk management plans.	Flood risk management

41 DEFRA (2015). Sustainable Drainage Systems – Non- statutory Technical Standards for sustainable Drainage Systems. Available at:

<https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards> [Date accessed: 04/06/24]

42 Environment Act (2021). Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> [Date accessed: 04/06/24]

43 DEFRA (2023) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan> [Date accessed: 04/06/24]

44 DEFRA (2023) Environmental Improvement Plan 2023. Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 04/06/24]

45 Flood Water and Management Act (2010). Available at: <https://www.legislation.gov.uk/ukpga/2010/29/contents> [Date accessed: 04/06/24]

46 Flood Risk Regulations (2009). Available at: <https://www.legislation.gov.uk/uksi/2009/3042/contents/made> [Date accessed: 04/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Government and Forestry Policy Statement (2013) ⁴⁷	Sets out clear priorities for future policy-making, focussed on protecting, improving and expanding our public and private woodlands.	Improve biodiversity
Health and Social Care Act (2012) ⁴⁸	Introduced the first legal duties about health inequalities. Sets a framework for the public sector to take action to reduce inequalities within England at local and national levels.	Improve access to healthcare
JNCC / Four Countries' Biodiversity Group (4CBG) (2024) UK Biodiversity Framework ⁴⁹	This framework aims to facilitate the collation and aggregation of information on activities and outcomes across the four countries. Seeking to refresh the " <i>broad enabling structure</i> " of the previous framework, it works to establish shared objectives for co-operation and collaboration, and establish a governance structure for overseeing and achieving the shared objectives of the four countries all seeking to meet the UK's international biodiversity commitments.	Improve biodiversity
Localism Act (2011) ⁵⁰	Seeks to give effect to the Government's ambitions to decentralise power away from Whitehall and back into the hands of local councils, communities and individuals to act on local priorities.	Sustainability choices made locally
The Marmot Review Implications for Spatial Planning (2011) ⁵¹	Provides evidence about the relationships between health and spatial design, and the socio-economic gradient in environmental disadvantage.	Improve access to healthcare
The National Flood and Coastal Erosion Risk Management Strategy (2020) ⁵²	Sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.	Food risk management

47 DEFRA (2013). Forestry Commission England. Government and Forestry Policy Statement. Available at: <https://www.gov.uk/government/publications/government-forestry-policy-statement> [Date accessed: 04/06/24]

48 Health and Social Care Act (2012). Available at: <https://www.legislation.gov.uk/ukpga/2012/7/contents/enacted> [Date accessed: 04/06/24]

49 JNCC on behalf on the Four Countries' Biodiversity Group (4CBG) (2024). UK Biodiversity Framework. Available at: <https://hub.jncc.gov.uk/assets/19a729f6-440e-4ac6-8894-cc72e84cc3bb> [Date accessed: 04/06/24]

50 Localism Act (2011). Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents/enacted> [Date accessed: 05/06/24]

51 Institute of Health Equity. The Marmot Review Implications for Spatial Planning (2011). Available at: <https://www.instituteofhealthequity.org/resources-reports/the-marmot-review-implications-for-spatial-planning> [Date accessed: 05/06/24]

52 Environment Agency (2020). The National Flood and Coastal Erosion Risk Management Strategy. Available at: <https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
National Policy Statements for Transport ⁵³	Sets out the Government's policy for delivery of major transport infrastructure.	Improve sustainable transport
National Policy Statement for Waste Water ⁵⁴	Sets out the Government's policy for delivery of major waste water infrastructure.	Improve water quality
Natural Environment and Rural Communities Act (2006) ⁵⁵	Created Natural England and the Commission for Rural Communities. 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.	Improve biodiversity
Natural Environment White Paper (2014) ⁵⁶	Recognises that the healthy natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing.	Improve green infrastructure
Planning Listed Building Conservation Area Act (1990) ⁵⁷	Altered the laws on granting of planning permission for building works, notably including those of the listed building system in England and Wales.	Heritage/cultural conservation
The Rural Economy Growth Review (2011) ⁵⁸	A package of measures designed to stimulate sustainable growth in the rural economy and help rural businesses to reach their full potential.	Equal access to facilities across the borough
The Water Act (2014) ⁵⁹	Enables greater competition for non- household customers and gives Ofwat new powers to make rules about charges and charges schemes, as well as making provision for flood insurance and drainage boards.	Improve water quality

53 Department for Transport (2014). National Policy Statements for Transport (2014). Available at: <https://assets.publishing.service.gov.uk/media/5a7e3ce4e5274a2e8ab46b99/npsnn-print.pdf> [Date accessed: 05/06/24]

54 DEFRA (2012). National Policy Statement for Waste Water. Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-waste-water> [Date accessed: 05/06/24]

55 Natural Environment and Rural Communities Act (2006) Available at: <https://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed 05/06/24]

56 DEFRA (2014) Natural Environment White Paper. Available at: <https://www.gov.uk/government/publications/natural-environment-white-paper-implementation-updates> [Date accessed: 05/06/24]

57 Planning Listed Building Conservation Area Act (1990). Available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents> [Date accessed: 05/06/24]

58 DEFRA (2011). The Rural Economy Growth Review. Available at: <https://assets.publishing.service.gov.uk/media/5a757a25e5274a1242c9e9f9/rural-economic-growth-review.pdf> [Date accessed 05/06/24]

59 The Water Act (2014). Available at: <https://www.legislation.gov.uk/ukpga/2014/21/contents/enacted> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Wildlife and Countryside Act 1981 (as amended) ⁶⁰	The primary legislation which protects animals, plants and habitats in the UK.	Improve biodiversity
National Design Guide (2021, DLUHC) ⁶¹	This guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice.	Improve quality and character of landscapes/ townscapes
Building for a Healthy Life (2020) ⁶²	Building for a Healthy Life is a Design Code to help people improve the design of new and growing neighbourhoods sustainably.	Improve quality and character of landscapes/ townscapes, improve accessibility

60 Wildlife and Countryside Act (1981) (as amended). Available at: <https://www.legislation.gov.uk/ukpga/1981/69> [Date accessed: 05/06/24]

61 DLUHC (2021) National Design Guide. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date accessed: 05/06/24]

62 Building for a Healthy Life (2020). Birkbeck & Kruczkowski with Jones, McGlynn and Singleton. Available at: <https://www.udg.org.uk/publications/othermanuals/building-healthy-life> [Date accessed: 05/06/24]

B.3 Sub-regional plans and programmes

Table B.3.1: *Sub-regional plans and programmes*

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Meres and Mosses BogLIFE Project (2017) ⁶³	Focussed on making better places for nature, people and communities. Aims to improve and protect core sites, and connect them by restoring the wetland habitats in and around them.	Improve green infrastructure
River Basin Management Plans (RBMP) – Humber RBMP⁶⁴, North Western District RBMP⁶⁵ and Severn RBMP⁶⁶	RBMPs set out how organisations, stakeholders and communities will work together to improve the water environment.	Improve water quality
Staffordshire Trent Valley Abstraction Licensing Strategy (February 2013) ⁶⁷	A licensing strategy to manage water resources in the Staffordshire Trent Valley Area.	Improve water quality

⁶³ Natural England (2017) Meres and Mosses BogLIFE Project. Available at: <https://www.gov.uk/government/publications/marches-mosses-boglife-project> [Date accessed: 05/06/24]

⁶⁴ Environment Agency (2022). Humber River Basin Management Plan. Available at: <https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022> [Date accessed: 05/06/24]

⁶⁵ Environment Agency (2022). North Western District River Basin Management Plan. Available at: <https://www.gov.uk/guidance/north-west-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 05/06/24]

⁶⁶ Environment Agency (2022). Severn River Basin Management Plan. Available at: <https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 05/06/24]

⁶⁷ Staffordshire Trent Valley (2013) Abstraction Licensing Strategy. Available at: <https://www.gov.uk/government/publications/cams-staffordshire-trent-valley-abstraction-licensing-strategy> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Flood Risk Management Plans (FRMP) – Humber⁶⁸, North West⁶⁹ and Severn⁷⁰ Basin Districts	FRMPs set out how organisations, stakeholders and communities will work together to manage flood risk.	Flood risk management
Draft Severn Trent Water Resource Management Plan 2024⁷¹	Sets out a plan to ensure there is sufficient provision of water resources in the area until 2085. The draft version of the Water Resource Management Plan has been published and has received comments following consultation.	Improve water quality
Severn Trent Water Annual Performance Report 2023⁷²	Provides stakeholders with information of water performance. It also outlines actions that need to be taken to improve water provision within the area.	Improve water quality
Stoke-on-Trent and Staffordshire Local Enterprise Partnership Annual Report (2022)⁷³	The LEP brings businesses and local authorities together to drive economic growth, create jobs and raise skill levels.	Improve employment opportunities
Stoke-on-Trent and Staffordshire LEP; Strategic Economic Plan Part 1 – Strategy⁷⁴	The LEP brings businesses and local authorities together to drive economic growth, create jobs and raise skill levels.	Improve employment opportunities

68 Environment Agency (2022). Humber Flood Risk Management Plan. Available at: <https://assets.publishing.service.gov.uk/media/638099ed8fa8f56eb302c6f8/Humber-FRMP-2021-2027.pdf> [Date accessed: 05/06/24]

69 Environment Agency (2022). North West Flood Risk Management Plan. Available at: <https://assets.publishing.service.gov.uk/media/63809c7ee90e072345afbd65/North-West-FRMP-2021-2027.pdf> [Date accessed: 05/06/24]

70 Environment Agency (2022) Severn Flood Risk Management Plan. Available at: <https://assets.publishing.service.gov.uk/media/63750f6de90e0728553b5654/Severn-FRMP-2021-2027.pdf> [Date accessed: 05/06/24]

71 Severn Trent (2022) Draft Severn Trent Water Resource Management Plan 2025-2085. Available at: <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/> [Date accessed: 05/06/24]

72 Severn Trent Water (2023) Annual Performance Report 2023. Available at: <https://www.severntrent.com/content/dam/stw/regulatory-library/severn-trent-water-annual-performance-report-revised-2023.pdf> [Date accessed: 05/06/24]

73 Stoke-on-Trent and Staffordshire Local Enterprise Partnership Annual Report (2022). Available at: <https://stokestaffslep.pagetiger.com/kmdqsc/sslepimpact> [Date accessed: 05/06/24]

74 Stoke-on-Trent and Staffordshire LEP; Strategic Economic Plan Part 1 – Strategy (2018). Available at: <https://www.stokestaffslep.org.uk/app/uploads/2019/01/SSLEP-Strategic-Economic-Plan-April-2018-.pdf> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Staffordshire Chambers Business Manifesto⁷⁵	Sets out principles of businesses in Staffordshire. It identifies barriers to employment and economic growth. It also recommends action by business and policy makers, both local and national, to stimulate enterprise and ambition.	Improve employment opportunities
Stoke-on-Trent and Staffordshire: Growth Deal Two⁷⁶	Focuses on town and city centre development, with major improvements to Stoke-on-Trent city centre access. Sets out programmes to enhance the appeal of the town centre, encouraging footfall and growing business opportunities.	Protect and enhance the vitality and viability of city, town and district centres
Staffordshire and Stoke-on-Trent strategic infrastructure plan (2018-2038)⁷⁷	This document provides a comprehensive and holistic view of emerging development and infrastructure requirements to support growth for the period 2018 to 2038. It presents an overview to aid understanding of infrastructure needs within Staffordshire and Stoke-on-Trent over a 20year timeframe.	Meeting the borough's needs

75 Staffordshire Chambers Business Manifesto. Available at: <https://staffordshirechambers.co.uk/representation/> [Date accessed: 05/06/24]

76 Stoke-on-Trent and Staffordshire: Growth Deal Two. Available at: <https://www.stokestaffslep.org.uk/delivering-growth/deals/growth-deal/> [Date accessed: 05/06/24]

77 AECOM (2019). Staffordshire and Stoke-on-Trent strategic infrastructure plan. Available at: <https://moderngov.staffordshire.gov.uk/documents/s130098/Appendix%201%20-%20Draft%20Strategic%20Infrastructure%20Plan.pdf> [Date accessed: 05/06/24]

B.4 Local environmental plans and programmes

Table B.4.1: Local environmental plans and programmes

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Staffordshire Local Nature Partnership (LNP)⁷⁸	Has the vision to make Staffordshire a more prosperous and healthier environment to live in. Believes that economic development can and must go hand-in-hand with the protection of the County's important environmental assets.	Importance of both economic and environmental development
Staffordshire Historic Environment Record⁷⁹	A database of over 21,000 archaeological sites and 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.	Heritage/cultural conservation
Newcastle-under-Lyme Register of Locally Important Buildings and Structures⁸⁰	The register is generally used to raise awareness in the community of our local heritage and to try and protect it from harmful change and demolition.	Heritage/cultural conservation
Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Natural and Rural Environment Technical Paper (2015)⁸¹	Summarises the key evidence and key challenges arising in relation to Green Infrastructure (open space) across both Stoke-on-Trent and Newcastle-under-Lyme.	Improve green infrastructure

78 Staffordshire Local Nature Partnership. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s4393/Staffordshire%20Local%20Nature%20Partnership%2018072012%20Cabinet.pdf> [Date accessed: 05/06/24]

79 Staffordshire County Council. Staffordshire Historic Environment Record. Available at: <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Record.aspx> [Date accessed: 05/06/24]

80 Newcastle-under-Lyme Borough Council. Newcastle-under-Lyme Register of Locally Important Buildings and Structures. Available at: <https://www.newcastle-staffs.gov.uk/conservation-heritage/register-locally-important-buildings-structures> [Date accessed: 05/06/24]

81 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council (2015) Natural and Rural Environment Technical Paper. Available at: https://www.stoke.gov.uk/downloads/file/732/natural_and_rural_environment_technical_paper [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Staffordshire Biodiversity Action Plan (SBAP) (1998)⁸²	The SBAP has been in place since 1998 in order to co-ordinate conservation efforts in delivering the UK Biodiversity Action Plan targets at a more local level.	Improve biodiversity
Staffordshire Geodiversity Action Plan (2010)⁸³	Produced to influence policy by liaising with local planning authorities and ensure that geodiversity issues are incorporated into local planning documents.	Improve geodiversity
Newcastle-under-Lyme Open Space and Green Infrastructure Strategy (2022)⁸⁴	A guide to how the Council managed its open space to meet the needs of the community in the most appropriate way. The strategy also addresses how land outside of the council's ownership is provided and maintained.	Improve green infrastructure
The Minerals Local Plan for Staffordshire 2015-2030⁸⁵	The new Minerals Local Plan is required to take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. This involves meeting objectively assessed needs for minerals. It is based on core planning principles including conservation and enhancement of the natural environment and reducing pollution as well as conserving heritage assets.	Promote recycling of materials, and where not possible, efficient use of resources
Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy 2013 Refreshed Headline strategy⁸⁶	Local Authorities across Staffordshire and Stoke on Trent have collaborated to produce a refreshed Joint Waste Management Strategy. This sets 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.	Encourage sustainable waste management

82 Staffordshire Biodiversity Action Plan (1998). Available at:

<http://www.sgap.org.uk/#:~:text=Staffordshire%20Biodiversity%20Action%20Plan&text=The%20Staffordshire%20Biodiversity%20Action%20Plan,at%20a%20more%20local%20level.> [Date accessed: 05/06/24]

83 Geoconservation Staffordshire (2010). Staffordshire Geodiversity Action Plan. Available at: <https://gcstaffs.org/home/staffordshire-geodiversity-action-plan-sgap/> [Date accessed: 05/06/24]

84 RSK (2022) Newcastle-under-Lyme Borough Council Open Space and Green Infrastructure Strategy, April 2022. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base#:~:text=The%20local%20plan%20evidence%20base,proposals%20in%20the%20local%20plan.> [Date accessed: 04/07/24]

85 Staffordshire County Council (2015). The Minerals Local Plan for Staffordshire 2015-2030 Available at:

<https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Adoption-Statement-Minerals-Local-Plan-for-Staffordshire-2015-2030.aspx#:~:text=The%20Plan%20identifies%20land%20for,Local%20Plan%201994%20to%202006.> [Date accessed: 05/06/24]

86 Staffordshire County Council (2013). Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy 2013 Refreshed Headline strategy. Available at:

<https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/JointMunicipalWasteManagementStrategy.aspx> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Staffordshire Local Flood Risk Management Strategy 2015⁸⁷	Sets out roles and responsibilities for flood risk management and assesses the risk of flooding in the county. Provides opportunities for funding to manage flood risk. Sets out what the policies are as a Lead Local Flood Authority and what the objectives and actions are to manage flood risk. The Council are in the process of updating this strategy, with the aim to publish the strategy in late January 2024.	Flood risk management
Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment 2019⁸⁸ and emerging update for 2024⁸⁹	The SFRA outlines the risk areas and factors for flooding within Newcastle-under-Lyme, and sets out a strategy to consider how these risks can be mitigated. The SFRA provides the basis for applying the Sequential Test to planning applications within flood zones, and provides advice for applicants carrying out site-specific Flood Risk Assessments.	Flood risk management
Newcastle-under-Lyme Contaminated Land Strategy (2014)⁹⁰	The Council's strategy to remediating contaminated land and bringing it back to successful use.	Promote and enhance the vitality of city, town and district centres
Staffordshire County Council Rights of Way Improvement Plan⁹¹	This ROWIP establishes a framework for managing the rights of way network over the next 10 years. It sets out priorities to meet the needs of today's users. The ROWIP proposes a series of actions to help achieve our priorities and will guide the targeting of our resources in future.	Improve sustainable transport Strengthen the quality of landscapes
Air Quality Action Plan for Newcastle-under-Lyme 2019-2024⁹²	This document details how the Council will work to improve air quality throughout the borough, particularly in the four identified AQMAs. It is the aim that this will reduce levels of pollution and subsequently detrimental health effects for residents across the LPA. There is an emerging air quality action plan being produced for 2024-2029, due to be completed in late summer of 2024.	Improve air quality

87 Staffordshire County Council (2015) Staffordshire Local Flood Risk Management Strategy. Available at: <https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Local-Flood-Risk-Management-Strategy.aspx> [Date accessed: 05/06/24]

88 JBA Consulting (2019) Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment, Final Report, 2019. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/765/level-1-strategic-flood-risk-assessment-report> [Date accessed: 05/06/24]

89 JBA Consulting (2024) Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment, Draft Report, May 2024.

90 Newcastle-under-Lyme Borough Council (2014) Newcastle-under-Lyme Contaminated Land Strategy 2014. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s13067/2012%20NuL%20Contaminated%20Land%20Strategy%20v4.pdf> [Date accessed: 05/06/24]

91 Staffordshire County Council (2007). Staffordshire County Council Rights of Way Improvement Plan. Available at: <https://www.staffordshire.gov.uk/Transport/Transport-Planning/Local-transport-plan/Documents/AppendixQROWIP.pdf> [Date accessed: 05/06/24]

92 Newcastle-under-Lyme Borough Council (2019) Air Quality Action Plan for Newcastle-under-Lyme 2019-2024. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s28367/4%20App%20AQAP%202019-2024.pdf> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Newcastle-under-Lyme Borough Council (2023) Air Quality Annual Status Report⁹³	This report identifies the causes of poor air quality, the main pollutants across the borough, hotspots and the worse affected areas and actions which need to be taken to improve the status of air quality throughout the area.	Improve air quality
Staffordshire County Council climate change adaptation & mitigation report 2020⁹⁴	The report recommends sustainability focused interventions for the authorities to consider in their emerging local plans	Climate change mitigation
Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt assessment part 1 (2017) part 2 (2020), part 3 (2023), and part 4 / Green Belt Village Study (2024)⁹⁵	These assessments form an independent, objective, evidence-based review of a number of reasonable alternative sites to understand to what extent they make an overall contribution to the five purposes of the Green Belt set out in the NPPF. In addition, the Green Belt Village Study examines the suitability of creating inseting within Keele Village from the impacts of building on the Green Belt.	Strengthen the quality of landscapes
Newcastle-under-Lyme (2022) Landscape & Settlement Character Assessment Study and Landscape Strategy⁹⁶	LSCA documents identify and explain the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas. LSCAs are used to inform planning policies, the allocation of land for development, the assessment of planning applications and the process of Environmental Assessment.	Strengthen the quality of landscapes
Newcastle-under-Lyme Borough Council and Stoke-on-Trent City	The Phase 1 Water Cycle Study (WCS) considers the impact of potential growth on waste water treatment works for the region and makes recommendations regarding water resources, supply and conservation. This aim of the WCS is to assist the Council to select and develop sustainable development allocations where there is minimal impact on the environment, water quality, water resources, infrastructure, and flood risk. The Phase 2 Water Cycle Study will provide an assessment of the impact of the growth options on water infrastructure and the water	Improve water quality

93 Newcastle-under-Lyme Borough Council (2023) Air Quality Annual Status Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/2096/full-annual-status-report> [Date accessed: 05/06/24]

94 AECOM (2020) Staffordshire County Council Climate Change Adaptation & Mitigation Report. Available at: https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Baseline%20Report_Rev04%20%28Updates%29_2020-10-16_Accessible.pdf [Date accessed: 05/06/24]

95 ARUP (various dates). Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt assessment part 1 (2017) part 2 (2020), part 3 (2023) and part 4(2024) / Green Belt Village Study (2024). Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base#:~:text=The%20local%20plan%20evidence%20base,proposals%20in%20the%20local%20plan.> [Date accessed: 05/06/24]

96 Chris Blandford Associates (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study Part 1 and Part 2. Available at www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base#:~:text=The%20local%20plan%20evidence%20base,proposals%20in%20the%20local%20plan. [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Council Water Cycle Study 2020⁹⁷ and emerging update for 2024⁹⁸	environment. The Phase 2 WCS is specific to Newcastle-under-Lyme and will update the evidence provided at Phase 1.	
Newcastle-under-Lyme Biodiversity Opportunity Mapping 2014⁹⁹	The purpose of the report is to show where priority habitats could be enhanced, restored or created in the borough as a basis from which to develop relevant policies and targets.	Improve biodiversity
Newcastle Borough Council Nature Recovery Network Mapping (2023)¹⁰⁰	This document outlines the existing picture of the districts nature network and describes locations where habitats may be created or enhanced to contribute to nature's recovery (the Nature Recovery Network), as well as delivering against objectives set out in national planning policy legislation.	Improve biodiversity
Newcastle-under-Lyme Green Belt Assessment (2024)¹⁰¹ and Green Belt Village Study (2024)¹⁰²	The Green Belt Assessment provides a review of a number of reasonable alternative sites to understand to what extent they make an overall contribution to the purposes of the Green Belt. The assessment consolidates previously assessed sites as well as providing assessments for new or amended sites, in order to aid the Council's decision-making regarding potential Green Belt release. In addition, the Green Belt Village Study examines the suitability of creating inseting within Keele Village from the impacts of building on the Green Belt.	Strengthen the quality of landscapes

97 JBA Consulting (2020) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study: Phase 1, January 2020. www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

98 JBA Consulting (2024) Newcastle-under-Lyme Phase 2 Water Cycle Study. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 23/07/24]

99 Staffordshire Wildlife Trust (2014) Newcastle-under-Lyme Borough Council Biodiversity Opportunity Mapping. Available at <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base#:~:text=The%20local%20plan%20evidence%20base,proposals%20in%20the%20local%20plan.> [Date accessed: 04/07/24]

100 Staffordshire Wildlife Trust (2023) Newcastle-under-Lyme Borough Council Nature Recovery Network Mapping. Available at <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base#:~:text=The%20local%20plan%20evidence%20base,proposals%20in%20the%20local%20plan.> [Date accessed: 05/06/24]

¹⁰¹ Arup (2024) Newcastle-under-Lyme Green Belt Assessment. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 04/07/24]

¹⁰² Arup (2024) NuL Green Belt Village Study. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 04/07/24]

B.5 Local social plans and programmes

Table B.5.1: Local social plans and programmes

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Staffordshire Health and Wellbeing Strategy 2022-2027 ¹⁰³	Sets out how the group plan to deliver their vision over the next five years. It provides strategic guidance and focus to enable organisations achieve the identified outcomes which will improve health and wellbeing of the local population.	Improve access to healthcare
Newcastle-under-Lyme Playing Pitch Strategy 2020 ¹⁰⁴	Provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities.	Improve access to leisure facilities
Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2024) ¹⁰⁵	This assessment provides information about the current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople, as well as providing information about additional support needs within the borough.	Meeting housing needs
Newcastle-under-Lyme Housing Strategy ¹⁰⁶	Supports the delivery of affordable housing and development. 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.	Meet housing needs
Newcastle-under-Lyme Homelessness and Rough Sleeping Strategy 2020-2025 ¹⁰⁷	This strategy sets out the council's priorities for the development of its homelessness strategy for the period 2020 to 2025.	Reduce homelessness

103 Staffordshire County Council. Staffordshire Health and Wellbeing Strategy 2022-2027. Available at: <https://www.staffordshire.gov.uk/Advice-support-and-care-for-adults/Information-resources/Health-and-wellbeing-board/Health-and-wellbeing-strategy-2022-2027.aspx> [Date accessed: 05/06/24]

104 Knight, Kavanagh & Page (2020) Newcastle-under-Lyme Borough Council Playing Pitch Strategy, December 2020. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base#:~:text=The%20local%20plan%20evidence%20base,proposals%20in%20the%20local%20plan.> [Date accessed: 04/07/24]

105 Arc (2020) Newcastle-under-Lyme Borough Council and City of Stoke-on-Trent Gypsy and Traveller and Travelling Showperson Accommodation Assessment, Final Report 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 03/07/24]

106 Newcastle-under-Lyme Borough Council. Housing Strategy. Available at: <https://www.newcastle-staffs.gov.uk/policies-1/housing-strategy> [Date accessed: 05/06/24]

107 Newcastle-under-Lyme Borough Council. Newcastle-under-Lyme Homeless and Rough Sleeping Strategy 2020-2025. Available at: <https://www.newcastle-staffs.gov.uk/policies-1/homelessness-rough-sleeping-strategy> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
A Whole Life Disability Strategy for Staffordshire 2018-2023¹⁰⁸	A set of principles and actions that will underpin the way the county council works with families, communities and partners to meet the needs of people with physical or learning disabilities, autism, and sensory impairments.	Equal opportunities for all
Staffordshire Learning Infrastructure Framework 2015-2030¹⁰⁹	Aims to set out how those who provide childcare or education can work together to make the best use of money and time. It sets out the purpose, principles and approach to the provision of education and childcare places, infrastructure development and capital investment.	Equal access to education for all
Newcastle-under-Lyme Borough Integrated Transport Strategy 2015-2026¹¹⁰	Aims to create a connected Staffordshire where everyone can get by efficiently and sustainably, and therefore lead to more independence, more job opportunities for individuals and the community feeling safer and supported.	Increase in access, efficiency and sustainability of transport
Emerging Newcastle-under-Lyme Local Plan Strategic Transport Assessment¹¹¹	Sweco have been commissioned by Newcastle-under-Lyme Borough Council to undertake a Strategic Transport Assessment (STA) in support of the emerging Regulation 19 version of the Local Plan. The STA will be utilised to undertake an assessment of the transport impacts of sites allocated for the local plan as well as three strategic developments located at: <ul style="list-style-type: none"> • J16 of the M6 • Talke • Keele 	Improve sustainable transport

¹⁰⁸ Staffordshire County Council. A Whole Life Disability Strategy for Staffordshire 2018-2023. Available at:

<https://moderngov.staffordshire.gov.uk/documents/s107280/Appendix%20A%20for%20Whole%20Life%20Disability%20Strategy.pdf> [Date accessed: 05/06/24]

¹⁰⁹ Staffordshire County Council. Staffordshire Learning Infrastructure Framework 2015-2030. Available at: <https://www.staffordshire.gov.uk/Education/Access-to-learning/Documents/SLIF-Final-Draft-for-engagement-240615.pdf> [Date accessed: 05/06/24]

¹¹⁰ Staffordshire County Council (2015) Newcastle-under-Lyme Borough Integrated Transport Strategy 2015-2026. Available at: <https://www.staffordshire.gov.uk/Transport/Transport-Planning/Documents/Documents/draftnewcastleboroughtransportstrategy.pdf> [Date accessed: 19/01/24]

¹¹¹ Sweco (2024) Newcastle-under-Lyme Local Plan Strategic Transport Assessment: Steering Group Inception Technical Note

B.6 Local economic plans and programmes

Table B.6.1: Local economic plans and programmes

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Newcastle-under-Lyme Borough Council Economic Development Strategy – Growing out People and Places 2019-2023 ¹¹²	Sets out the council's aspirations and priorities for the next four years and focuses on place and infrastructure, business environment and people and ideas.	Improve employment opportunities
Newcastle-under-Lyme Borough Council Asset Management Strategy 2018/19-2021/22 ¹¹³	Seeks to demonstrate how the council deploys its land/property assets to support the needs of the borough's residents.	Meeting the borough's needs
Staffordshire Local Transport Plan (Staffordshire County Council, 2011) ¹¹⁴	The plan covers walking, cycling, public transport, car-based travel and freight, together with the management and maintenance of local road and footways. Staffordshire County Council are developing a new transport plan which is expected to be completed by December 2024.	Improve sustainable transport
Stoke-on-Trent Transport Plan 3 (2011/12 – 2025/26) ¹¹⁵	Intended to explain the forward transport priorities within the area of Stoke-on-Trent with detailed plans for 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.	Improve sustainable transport

112 Newcastle-under-Lyme Borough Council. Newcastle-under-Lyme Borough Council Economic Development Strategy – Growing out People and Places 2019-2023. Available at: <https://www.newcastle-staffs.gov.uk/policies-1/economic-development-strategy> [Date accessed: 05/06/24]

113 Newcastle-under-Lyme Borough Council. Newcastle-under-Lyme Borough Council Asset Management Strategy. Available at: <https://www.newcastle-staffs.gov.uk/policies-1/asset-management-strategy> [Date accessed: 05/06/24]

114 Staffordshire County Council (2011) Staffordshire Local Transport Plan. Available at: <https://www.staffordshire.gov.uk/Transport/Transport-Planning/Local-transport-plan/Home.aspx#:~:text=Staffordshire%20County%20Council%20published%20a,the%20Local%20Transport%20Act%202008.&text=Since%202011%2C%20the%20LTP%20has,majority%20of%20the%202011%20LTP.> [Date accessed: 05/06/24]

115 City of Stoke-on-Trent Council. Stoke-on-Trent Transport Plan 3 (2011/12 – 2025/26). Available at: https://www.stoke.gov.uk/directory_record/334847/stoke-on-trent_local_transport_plan_3_201112_-_202526 [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Newcastle-under-Lyme and Stoke-on-Trent Retail and Leisure Study 2019¹¹⁶	This study provides a comprehensive analysis of the current and emerging retail and leisure trends, existing retail floorspace and leisure facilities, and retail and leisure needs across the borough.	Meeting the borough's needs Protect and enhance the vitality and viability of centres

116 Newcastle-under-Lyme Borough Council (2019) Newcastle-under-Lyme and Stoke-on-Trent Retail and Leisure Study. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 03/07/24]

B.7 Local existing planning policy

Table B.7.1: Local existing planning policy

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (2006-2026) ¹¹⁷	Sets out a broad framework for the future development of the whole of Newcastle-under-Lyme and Stoke-on-Trent.	Sustainable development across both areas
Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Joint Local Plan Preferred Options Consultation document February 2018 ¹¹⁸	This document acts as a guide to help shape development within Stoke-on-Trent and Newcastle-under-Lyme. It builds on the Issues and Strategic Options consultations and assists with setting out a strategic vision for the plan area.	Sustainable development across both areas
Newcastle-under-Lyme Local Plan (2011) Saved Policies ¹¹⁹	These policies were saved beyond September 28 th 2007 by the Secretary of State for Communities and Local Government, and are yet to be replaced by new policies in the 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.	Sustainable development across Newcastle-under-Lyme
Newcastle-under-Lyme Borough Council	The Supplementary Planning Documents (SPDs) support the strategy and policies for Newcastle-under-Lyme in the Core Strategy, which was adopted in 2009.	Sustainable development across Newcastle-under-Lyme

¹¹⁷ City of Stoke-on-Trent Council and Newcastle-under-Lyme Borough Council (2009) Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026. Available at: https://www.stoke.gov.uk/directory_record/331603/sot_and_nul_local_development_framework_core_spatial_strategy_2006_to_2026 [Date accessed: 05/06/24]

¹¹⁸ City of Stoke-on-Trent Council and Newcastle-under-Lyme Borough Council (2018) Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Joint Local Plan Preferred Options Consultation document, February 2018. Available at: https://www.stoke.gov.uk/download/downloads/id/999/joint_local_plan_preferred_options_consultation_document.pdf [Date accessed: 05/06/24]

¹¹⁹ Newcastle-under-Lyme Borough Council. Newcastle-under-Lyme Local Plan (2011) Saved Policies. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/100/current-development-plan> [Date accessed: 05/06/24]

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability theme
Supplementary Planning Documents (SPDs)¹²⁰: <ul style="list-style-type: none"> • Affordable Housing 2009 • 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 		

120 Newcastle-under-Lyme Borough Council. Newcastle-under-Lyme Borough Council Supplementary Planning Documents (SPDs). Available at: <https://www.newcastle-staffs.gov.uk/planning-policy> [Date accessed: 04/07/24]

Appendix C: Consultation Responses to the SA

Appendix C contents

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C.1 Overview

C.1.1 Purpose of this document

- C.1.1.1 This appendix provides a summary of the consultation responses received during the Sustainability Appraisal (SA) process to date, and how the comments received have been considered.
- C.1.1.2 The SA Scoping Report was prepared by Newcastle-under-Lyme Borough Council (NuLBC) and was published for consultation in May 2021, and subsequently updated in August 2021¹. **Table C.2.1** provides a summary of the consultation responses received from the statutory bodies (the Environment Agency, Historic England and Natural England) in relation to the SA Scoping Report, and indicates how the comments received have influenced the SA.
- C.1.1.3 The Regulation 18 SA Report (2023)² was prepared by Lepus Consulting and was published for consultation alongside NuLBC's 'First Draft Local Plan' between 19th June and 14th August 2023. **Table C.3.1** provides a summary of the consultation responses received from the statutory consultees, and other local residents and interested parties, in regard to the SA. These comments can be found on the Council's consultation portal³.

¹ Newcastle-under-Lyme Borough Council (2021). Newcastle-under-Lyme Borough Council Local Plan (2020-2040). SA Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan/2> [Date accessed: 22/01/24]

² Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volumes 1-3. May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 31/01/24]

³ Newcastle-under-Lyme Borough Council (2024) Newcastle-under-Lyme Consultation Portal: Sustainability Appraisal – what people say. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504/peoplesubmissions/> [Date accessed: 14/06/24]

C.2 Scoping

Table C.2.1: Consultation comments received from statutory consultees in response to the Newcastle-under-Lyme SA Scoping Report (2021)

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
Environment Agency	<p>Managing and reducing flood risk should be an integral part of any regeneration and growth plans within the Plan area which includes the Lyme Brook as well as a number of their tributaries. Local Plan policies should seek to not only mitigate flood risk but adapt to the impacts of climate change by encouraging a reduction in flood risk from development.</p> <p>Flood risk from all sources of flooding will need to be considered as part of this Local Plan, as required under NPPF paragraph 156, taking into account the predicted impacts of climate change. We note, a Level 1 Strategic Flood Risk Assessment (SFRA) was published January 2019. The SFRA provides a number of policy recommendations which should inform Local Plan policies 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.</p>	Climate change and flood risk are considered within SA Objectives 1 and 5 (see Appendix A).
Environment Agency	Under Objective 5, consideration should be given to providing buffer zones from watercourses to allow maintenance of watercourses and resilience from the impacts of climate change. Further to this, we advise for the assessment of a 'Major positive effect' under the SA Framework, developments should demonstrate a reduction in flood risk and not only 'mitigate' risk of surface water flooding.	Addressed in Scoping Report, and incorporated into the methodology for assessment of reasonable alternative sites under SA Objective 5 (see Appendix E).
Environment Agency	<p>We recommend further emphasis on blue-green infrastructure and corridors as they provide multiple benefits to areas including services such as creating habitats, flood management provision, green space, cooling local temperatures, ecological function and amenity. All developments should create space for water by restoring floodplains and contributing towards blue- green infrastructure.</p> <p>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.</p> <p>Habitat connectivity will be particularly important in relation to climate change as species will need to be able to move more freely as environmental changes take place. Identifying specific opportunities could be informed by strategic plans like the Nature Recovery Network Map.</p>	<p>Addressed in Scoping Report and reflected in SA Objectives 3 and 9 (see Appendix A).</p> <p>However, there is limited data available at the site level to inform the assessment of reasonable alternative sites with regard to effects on blue-green infrastructure corridors (see Appendix E).</p>
Environment Agency	We advise to determine a 'Major positive effect' from development under Objective 6 of the SA Framework, it should be specified that the development improves the 'Ecological Status' of a waterbody under the WFD as a clear indicator.	Addressed in Scoping Report, and incorporated into the methodology for assessment of reasonable alternative sites under SA Objective 6 (see Appendix E).

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
Environment Agency	<p>The timing and phasing of development should be synchronised with the delivery of appropriately located modern and sustainable waste management infrastructure that meets the needs of the local community. Opportunities to integrate waste management into proposed new development should be considered.</p> <p>Services provided should encourage and enable communities to follow the waste hierarchy – reduce, re- use, recycle, recover, with landfill as the last resort.</p> <p>Waste minimisation and resource efficiency should be at the heart of all new development. The design of buildings and supporting infrastructure should consider their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle to-cradle' design).</p>	Waste is considered within SA Objective 4 (see Appendix A).
Historic England	<p>Page 14, we would recommend also including the National Planning Policy Framework and 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/</p> <p>Under 'local environmental' on page 21 we would recommend that you include local heritage information such as the Staffordshire Historic Environment Record/ Newcastle under Lyme Local List/ are there any local or sub regional heritage strategies or programmes that can be included in this section? Public Realm Strategy or Infrastructure Strategy that seeks to enhance heritage?</p>	Addressed in Scoping Report, and reflected in updated Policies, Plans and Programmes (PPP) review (see Appendix B).
Historic England	We are supportive of the inclusion of a local list in the Council area and the intention to conserve local heritage.	Locally important buildings and structures are considered within SA Objective 7 (see Appendix A).
Historic England	Is there any heritage at risk in the borough? And how may the Local Plan address this?	Heritage at Risk is considered within SA Objective 7 (see Appendix A).
Historic England	Page 101 references that some effects may be uncertain or unknown. We are particularly keen that any effects for the historic environment are known and avoided/ or mitigated.	The assessment of reasonable alternatives and draft policies within this report has followed the methodology and scoring system as set out in Chapter 4 , where significance and magnitude are indicated where possible, although it should be acknowledged that SA/SEA is high level and, in some instances, full effects can only be truly known at the detailed planning application stage.
Historic England	We welcome objective 7 as a specific objective for the historic environment and are keen to see that this is included within the SEA.	SA Objective 7 remains focused on the historic environment and cultural heritage (see Appendix A).
Historic England	We recommend that objective 8 also relates to historic landscapes and townscapes and these considerations are included, especially with respect to cumulative impacts.	Addressed in Scoping Report, and reflected in SA Objective 7 wording (see Appendix A).

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
Historic England	Our expectation would be that where effects are identified that the SEA sets out how these could be avoided and mitigated against and that there is specific text or actions that can be included within the Local Plan, to ensure that these measures are taken at the appropriate time.	The Regulation 19 SA includes consideration of how identified adverse impacts could be avoided or mitigated in relation to each SEA topic chapter (See Chapters 7 to 15 of the main Regulation 19 SA Report in Volume 2). Additionally, Appendix H presents information regarding the pre- and post-mitigation assessment of reasonable alternative sites throughout the SA process, drawing on the emerging Local Plan policies.
Historic England	We would be willing to comment on any indicators that can be used to measure the success of the objectives set out in this scoping report.	The SA Framework includes a range of suggested indicators alongside each SA Objective (see Appendix A).
Natural England	Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area; <ul style="list-style-type: none"> • 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 	An updated review of relevant Plans, Policies and Programmes (PPPs) including applicable PPPs as mentioned has been carried out within this report (see Appendix B).
Natural England	Objective 1: Carbon dioxide is not the only greenhouse gas that contributes to climate change, some of the other main greenhouse gases are methane, nitrous oxide, fluorinated gases. We would suggest broadening the SA objective to include reducing these other greenhouses gases.	Addressed in Scoping Report, and reflected in SA Objective 1 wording (see Appendix A).
Natural England	Objective 3: The borough contains two statutory protected RAMSAR sites; Midland Meres and Mosses Phase 1 & 2 at Betley Mere along with five Site of Special Scientific Interest (SSSI). The objective does not adequately cover these sites and should be reworded or a new objective should be added.	Potential effects of the Local Plan on biodiversity sites including European sites and SSSIs are considered through SA Objective 3 alongside other biodiversity designations (see Appendix A).
Natural England	It is important that any monitoring indicators relate to the 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:	The suggested indicators have been incorporated into the SA Framework (see Appendix A) where appropriate.

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
	<ul style="list-style-type: none">• 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. <p>Green infrastructure:</p> <ul style="list-style-type: none">• 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. <p>Soil:</p> <ul style="list-style-type: none">• The amount of soil sealed.	

C.3 Regulation 18

Table C.3.1: Consultation comments received in response to the Newcastle-under-Lyme Regulation 18 SA (2023)

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA as provided by NuLBC ⁴	Incorporation into the SA
Comment ID SA2	Objection to site allocation – including green belt, infrastructure, congestion, air quality etc. [detailed comments not replicated here]	Comments do not relate directly to the SA. It is the Council's role to select and reject sites for allocation, using the evaluation in the SA and other evidence base information. See Appendix I for the latest selection and rejection information provided by the Council.
Comment ID SA3	General Comment – <i>"There is a total bias towards building on green belt land and also in Audley. This is totally unacceptable and unnecessary."</i>	No specific comments on the SA.
Comment ID SA5	Objection – <i>"Air pollution is always bad. Especially at peak commute times"</i>	No specific comments on the SA.
Comment ID SA6	Objection – <i>"I object to these proposals. It will have a negative affect on the environment, doctors waiting lists, wildlife in the area and air quality to name a few".</i>	No specific comments on the SA.
Comment ID SA7	Objection to site allocation – lack of infrastructure to support new development, green belt, wildlife, traffic etc. [detailed comments not replicated here]	Comments do not relate directly to the SA. It is the Council's role to select and reject sites for allocation, using the evaluation in the SA and other evidence base information. See Appendix I for the latest selection and rejection information provided by the Council.
Comment ID SA8	<i>"Because access routes to this major allocation are not specified, it is not possible to assess the full impact of this development under many of the crireria used in the Sustainability Appraisal. For example access provided from A500 would have vastly different impacts compared to access via new or existing roads from Audley village side with resect to landscape, natural history, air quality</i>	The SA provides a high-level evaluation of reasonable alternative sites on a comparable basis using secondary data. The Council will consider the SA findings alongside other evidence base information, such as site-specific

⁴ Newcastle-under-Lyme Borough Council (2024) Newcastle-under-Lyme Consultation Portal: Sustainability Appraisal – what people say. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504/peoplesubmissions/> [Date accessed: 14/06/24]

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA as provided by NuLBC ⁴	Incorporation into the SA
	<i>and public amenity. Currently the SA considers only the footprint of the development itself. Access details should be provided and assessed for their impacts before the development allocation is included in the Local Plan" [sic]</i>	access and transport evidence, to inform the selection and rejection of reasonable alternatives. See Appendix I for the latest selection and rejection information provided by the Council.
Comment ID SA9	<i>"This large proposed housing allocation appears to 'absorb' the ancient trackway/public highway named Bell's Hollow. I cannot see any reference to adverse impacts on this ancient landscape feature (SA4) or the access it provides (SA11) within the SA. Nevertheless this allocation has been selected to be included in the plan."</i>	The SA is a high-level assessment reliant on secondary data. No information on ancient landscape features has been made available by the Council to inform the SA. Since the Regulation 18 consultation, the boundary for Site CT1 has been amended and now does not encompass this road; the amended version of the site has been assessed as a reasonable alternative site within Appendix F , and alongside all other alternatives in Appendix H .
Comment ID SA13	Objection to site allocation <i>"I would like to state my strongest objections related to the content of the draft Local Plan and the impact for the site allocations noted within it. Specifically in relation to NC13, the land West of Bullocks House Road in Harriseahead..."</i> [detailed comments not replicated here]	Comments do not relate directly to the SA. It is the Council's role to select and reject sites for allocation, using the evaluation in the SA and other evidence base information. See Appendix I for the latest selection and rejection information provided by the Council.
Comment ID SA14	<i>"Traffic and Pollution. Making the assumption that each house will have 1 car at a minimum that is an extra 778 cars on the roads around the area. This will produce on average 3600 metric tonnes of CO2 per year minimum. Road access is at a premium. The proposal is an access point on the A34. This will create more congestion on this already busy road northbound at peak times. Southbound commuters will need to use the local Red Street roads such as Bells Hollow (single track), Talke Road and Liverpool Road. These roads are already extremely busy. Healthcare. There are 4 local GP surgeries, all with proposed increases in housing in the area. The already significant wait for appointments will increase exponentially." [sic]</i>	No specific comments on the SA. The information provided will be considered within the contextual and baseline information as presented in the Regulation 19 SA main report (Volume 2) which is used to inform the SA assessments.
Comment ID SA 15	Support the SA	No specific comments on the SA.

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA as provided by NuLBC ⁴	Incorporation into the SA
	<p><i>"It is vital for the future of Newcastle Under Lyme and all of its boroughs that a robust local plan emerges from the draft. There may be difficult decisions that need to be made such as allowing the development of some greenbelt sites. It is always possible attach greenbelt status to other land, maybe a call to local farm lands to request that they protect their greenfields with greenbelt status.</i></p> <p><i>NUL will not thrive if we continue to allow antiquated policies to take precedence over the necessity to all of the community.</i></p> <p><i>We should not allow our hearta rule our heads in these matters.</i></p> <p><i>A sensible approach is needed, there is after all a considerable shortfall of housing for the next generation. Whilst some people may be pointing ut the number of houses currently for sale on right move we have to ask many questions and need to take the numbers mentioned with a pinch of salt. As these home owners upsizing, downsizing, splitting up, moving out of the area, passed away? Not all such house with be immediately vacant.</i></p> <p><i>As the population in this area is aging we need to have suitable housing for the aging community to move to whether that be smaller houses, retirement appartments, residantial homes or bungalows. This will free up housing for others to move up the ladder into."</i> [sic]</p>	
Comment ID SA16	<p>Objection to site allocation</p> <p><i>"Concerns regarding NC13 - This site is not suitable for many reasons...</i></p> <p>Issues:</p> <ul style="list-style-type: none"> <i>Marshland on the site</i> <i>Loss of significant wildlife and greenbelt creating urban sprawl</i> <i>Protected wildlife as stated on HRA section of this site</i> <i>Reduced bus services in the area</i> <i>Only one small doctors' surgery in Packmoor which is full to capacity</i> <p><i>Lack of other facilities schools and other..."</i></p>	<p>Comments do not relate directly to the SA.</p> <p>It is the Council's role to select and reject sites for allocation, using the evaluation in the SA and other evidence base information. See Appendix I for the latest selection and rejection information provided by the Council.</p>
Comment ID SA17	<p>Objection to site allocation</p> <p><i>"Concerns regarding NC77 - This site is not suitable for many reasons...</i></p> <p>Issues:</p> <ul style="list-style-type: none"> <i>mine shafts risk of subsidence and health risks associated</i> <i>High risk site to develop as per the Council's own rept</i> 	<p>Comments do not relate directly to the SA.</p> <p>It is the Council's role to select and reject sites for allocation, using the evaluation in the SA and other evidence base information. See Appendix I for the latest selection and rejection information provided by the Council.</p>

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA as provided by NuLBC ⁴	Incorporation into the SA
	<ul style="list-style-type: none"> • <i>Loss of significant wildlife and greenbelt creating urban sprawl</i> • <i>Protected wildlife as stated on HRA section of this site</i> • <i>Reduced bus services in the area</i> • <i>Only one small doctors' surgery in Packmoor which is full to capacity</i> • <i>Lack of other facilities schools and other</i> • <i>Potential entrance to site is not in the Borough</i> • <i>Breach of boundary separation with Stoke Council</i> • <i>Lack of consultation with Stoke Council</i> • <i>Newcastle end of the site NC77 has many trees and intensive wildlife</i> <p><i>Loss of public footpaths" [sic]</i></p>	
Natural England	<p><i>We note the refer to Policy PSD7: Design and using green/blue infrastructure to contribute towards filtration of air pollutants and would advise that though vegetation can be used to reduce air pollutant impacts if designed correctly, it can also cause problems if not designed well. Please see this briefing note for further information:</i> http://epapers.bham.ac.uk/4112/1/UoB_TreePlantingUrbanAir.16.pdf</p>	<p>The updated policy assessments are presented in Appendix G, with Natural England's comments taken into consideration for the assessment of Policy PSD7 and other relevant policies in terms of the caveats to benefits from GI on air pollution.</p>
Historic England	<p>No direct comments received regarding the SA, although the response to the Regulation 18 Local Plan consultation document mentions:</p> <p><i>"Strategic Objectives – We request a specific objective for the historic environment. This both enables the Plan to have a focus to ensure that there is a positive strategy for the historic environment (National Planning Policy Framework (NPPF) Paragraph 190), as well as feed into the Strategic Environmental Assessment (SEA) process. We consider it essential that there is a specific indicator for heritage</i></p> <p><i>...Policy PSD 3 Distribution of Development - When considering the most appropriate locations for development we urge you to consider how the historic environment may be impacted by the location of proposals. The SEA process ensures that reasonable alternative sites are considered so that the harm to heritage can be avoided/ minimised. The Plan should consider whether the proposed locations/ distribution of development is appropriate or whether other options are more suitable which would not cause harm to heritage."</i></p>	<p>The Regulation 18 SA included a recommendation to revise the Strategic Objectives to ensure reference is made to the conservation and enhancement of the borough's cultural heritage.</p> <p>The Strategic Objectives were subsequently revised by NuLBC, and re-assessed in the SA (see Appendix G).</p> <p>Various options for housing growth and distribution of development have been evaluated in the SA process against the SA Framework (see Chapter 5 and Appendix D) although it should be noted that these assessments have been carried out at a high level and, in some instances, full effects can only be truly known at the detailed planning application stage.</p>
Environment Agency	No direct comments received regarding the SA.	N/A

Appendix D: Assessment of Additional Growth Options, Growth Scenarios and Safeguarded Land

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D.1 Introduction

D.1.1 Context and purpose of this document

D.1.1.1 This appendix presents assessment information relating to additional reasonable alternatives that have been identified by Newcastle-under-Lyme Borough Council (NuLBC) since the Regulation 18 'First Draft Local Plan' consultation in 2023.

D.1.1.2 **Chapter D.2** sets out the evaluation of three additional housing growth options, and **Chapter D.3** sets out the evaluation of three additional employment growth options. The reasonable alternatives appraised in these chapters relate to the likely sustainability effects of high-level options for the overall quantum of housing and employment growth. They represent updated versions of the three housing and three employment growth options which were evaluated in the Regulation 18 SA¹, which have been identified by the Council considering the latest evidenced housing and employment needs for the borough. These options do not contain any spatial information.

D.1.1.3 **Chapter D.4** sets out the evaluation of one additional 'growth direction option', further to the six options evaluated at the Regulation 18 stage, known as 'Growth Direction Option Zero'. This additional option will focus development within existing development boundaries and includes density uplift within town centres.

D.1.1.4 **Chapter D.5** sets out the evaluation of four 'growth scenarios' which have been identified by NuLBC. These four reasonable alternatives relate to options for the distribution of strategic employment development sites in the borough, drawing on the higher level 'growth direction options' which were identified by NuLBC and evaluated in the SA at the Regulation 18 stage, and in particular Growth Direction 6 which referred to a combination of strategic sites forming a potential spatial strategy.

D.1.1.5 **Chapter D.6** sets out the evaluation of three options exploring the potential safeguarding of land within NuLBC for housing growth beyond the Plan period, aligning with the requirements of the NPPF.

D.1.2 Methodology

D.1.2.1 Each of the reasonable alternatives or 'options' assessed within this appendix has been assessed for likely impacts on each of the 12 SA Objectives, as outlined in the SA Framework (see **Appendix A**).

D.1.2.2 Each reasonable alternative has been evaluated in accordance with the methodology set out in **Chapter 4** of the main SA Report (see **Volume 2**). The scoring system is summarised here for ease of reference; a single value from **Table D.1.1** has been allocated to each SA Objective for each reasonable alternative.

¹ Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volumes 1-3. May 2023.
Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 06/06/24]

D.1.2.3 It should be noted that given the high-level nature of the options, the assessments are necessarily high level with restricted diagnostic conclusions. The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distil the wide-ranging effects of a broad growth or spatial option into one overall impact.

Table D.1.1: *Guide to scoring significant effects*

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant net effect on the overall achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

D.2 Assessment of Housing Growth Options

D.2.1 Preface

D.2.1.1 Paragraph 61 of the National Planning Policy Framework (NPPF) (2023)² states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method as outlined in Planning Practice Guidance (PPG)³, unless the local authority feel that circumstances warrant an alternative approach.

D.2.1.2 The NPPF also states that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.

D.2.1.3 In 2020, Stoke-on-Trent City Council and NuLBC jointly commissioned a housing assessment for their shared geographic area, to inform the former emerging Joint Local Plan. Following the ending of work on the Joint Local Plan, the previous Joint Housing Needs Assessment (2020)⁴ was updated. Based on information from the Housing and Economic Needs Assessment (HEDNA) Update for Newcastle-under-Lyme (2023)⁵, three reasonable alternatives for the levels of housing growth to be delivered through the new Local Plan were identified by NuLBC and evaluated in the Regulation 18 SA⁶. These three options related to variations on the standard method at the time of their evaluation, and modelled employment forecasts:

- Option 1: Standard Method – 358 dwellings per annum (dpa), equating to 7,160 dwellings for the Plan period 2020-2040;
- Option 2: Midpoint of employment forecasts – 301 dpa, equating to 6,020 dwellings for the Plan period; and
- Option 3: Highest employment forecast – 369 dpa, equating to 7,380 dwellings for the Plan period.

² DLUHC (2023) National Planning Policy Framework, December 2023. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date accessed: 06/06/24]

³ DLUHC and MHCLG (2020) Planning Practice Guidance: Housing and economic needs assessment. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 28/05/24]

⁴ Turley (2020) Housing Needs Assessment: Newcastle-under-Lyme & Stoke-on-Trent. June 2020. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/261/housing-and-economic-needs-assessment-2020> [Date accessed: 28/05/24]

⁵ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

⁶ Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volumes 1-3. May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 06/06/24]

D.2.1.4 Since the Regulation 18 consultation, a further HEDNA Update for Newcastle-under-Lyme has been prepared in April 2024⁷. According to this updated evidence, as of 2023, the minimum housing need figure for Newcastle-under-Lyme is now 347 homes per year, based on the national standard method. This means that the housing need which the Local Plan must seek to meet for the Plan period (2020 to 2040) is 6,940 homes.

D.2.1.5 The Council has identified two further reasonable alternative housing numbers for consideration alongside the latest standard method figure, based on different modelled employment forecasts as set out in the latest HEDNA, as there is concern that the standard method figure would not provide enough homes to align with the employment growth forecasts for the Plan period.

Housing Growth Options

- High-level options for the scale of housing growth to be delivered through the new Newcastle-under-Lyme Local Plan
- Growth Options lack any spatial detail

D.2.1.6 The three reasonable alternative options for the quanta of housing growth identified by NuLBC at this stage of the plan making process, following on from the three options considered at the Regulation 18 stage, are presented in **Table D.2.1**.

Table D.2.1: Newcastle-under-Lyme Housing Growth Options identified by NuLBC at the Regulation 19 stage

Housing growth option	Dwellings per annum	Total dwelling requirement 2020-2040
1. Standard Method	347	6,940
2. Standard Method plus uplift for working age population	400	8,000
3. Higher growth option	435	8,700

D.2.1.7 **Table D.2.2** summarises the likely impacts of each housing growth option in relation to the 12 SA Objectives. The text within **section D.2.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

D.2.1.8 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by NuLBC, as well as expert judgement. The growth options relate to quanta only and do not include any spatial information.

⁷ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 04/07/24]

D.2.2 Assessment

SA Objective 1 – Climate Change

- D.2.2.1 Residential buildings represent the second highest source of greenhouse gas (GHG) emissions in the borough, forming 27% of the total emissions in Newcastle-under-Lyme behind road transport⁸. The proposed new development options would all be likely to increase carbon dioxide (CO₂) and other GHG emissions during both the construction and occupation of development, including via increased traffic on the local road networks. However, with decarbonisation and increased uptake of electric vehicles, the emissions could potentially be reduced despite new dwellings being built. As Option 3 proposes the largest number of new dwellings, it is likely that this option would have the potential to increase emissions to the greatest extent, followed by Option 2. All options could therefore lead to a major negative impact for this objective in the short and medium term. Option 1 would potentially produce the smallest increase in emissions as it has the fewest number of new dwellings (c.1,000 less than the other two options). In this respect, Option 1 is the best performing option for this SA Objective.
- D.2.2.2 The potential for new development under any growth option to draw on renewable or low-carbon energy supplies is not known. Similarly, opportunities to link with sustainable travel networks and reduce reliance on private cars are not known at this scale of assessment.

SA Objective 2 – Air

- D.2.2.3 Air quality, and particularly nitrogen dioxide (NO₂) concentration, is of primary concern in Newcastle-under-Lyme, sources of which include the burning of petrol and diesel, which is primarily used for road transport. Of this, some 45% of emissions come from motorways crossing the region⁹. Three Air Quality Management Areas (AQMAs) have been declared in the borough due to exceedances in NO₂ (acknowledging the recent revocation of the 'Little Madeley' AQMA)¹⁰. Option 1 would create the fewest number of new homes and so potentially the fewest number of additional journeys and associated emissions; therefore, this option would likely be the best performing under air quality considerations. Conversely, Option 3 would create the highest number of new dwellings and so potentially the highest number of new journeys, followed closely by Option 2. However, the location of the new dwellings across the borough would have an impact on the length of potential journeys. Based on quanta alone, all options have the potential to lead to a minor negative impact on air quality.

⁸ AECOM (2020) Climate change and mitigation Baseline Report, Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/262/climate-change-adaptation-and-mitigation-report-2020> [Date accessed: 28/05/24]

⁹ Newcastle-under-Lyme Borough Council (2021) Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed 28/05/24]

¹⁰ DEFRA (2024) AQMAs declared by Newcastle-under-Lyme Borough Council. Available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=170 [Date accessed: 06/06/24]

SA Objective 3 – Biodiversity, Flora and Fauna

- D.2.2.4 The borough contains a range of biodiversity designations and features including sections of the Midland Meres and Mosses Phase 1 and Phase 2 Ramsar sites, as well as a number of Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), and Local Wildlife Sites (LWS), and across the region there are areas of low, medium and high habitat distinctiveness. There are priority woodland, grassland, marsh and heathland habitats as well as ancient woodlands within the borough. Farmland covers a significant proportion of the borough with pasture the dominant use and areas of arable land on more productive land. Hedges, ditches, trees and small copses all form part of the ecological mosaic within farmland and enhance biodiversity value. All three of the proposed housing growth options have the potential to lead to adverse impacts on biodiversity, flora and fauna due to increased development related threats and pressures on both designated and non-designated biodiversity assets, including through reductions in air quality and water quality/quantity, habitat fragmentation and recreational pressures on wildlife sites. As Option 1 proposes the least number of houses it could potentially have a lesser impact than Options 2 and 3.

SA Objective 4 – Natural Resources & Waste

- D.2.2.5 The majority of the land within Newcastle-under-Lyme Borough is Agricultural Land Classification (ALC) Grade 3, although there are pockets of Grade 2 land in the south. Development within the existing urban area would not result in loss of any 'best and most versatile' (BMV) agricultural land and may present more opportunities for re-use of previously developed land, however, as the location of the proposed developments in the three options is not currently known their impact on BMV land is uncertain. Mineral Safeguarding Areas (MSAs) are present across a large proportion of the borough and development within these areas would potentially lead to sterilisation of mineral resources.
- D.2.2.6 All three housing growth options would likely lead to increase household waste production, and could lead to increased pressure on mineral and soil resources across the borough, resulting in a minor negative impact against this SA Objective. Option 1 may represent the best performing option as it proposes the fewest number of dwellings and correspondingly is likely to result in the smallest increase in waste production and least pressure to natural resources.

SA Objective 5 – Flooding

- D.2.2.7 Historic flooding records highlight the risk from the Lyme Brook, culverted watercourses and surface water. The areas most affected have been Kidsgrove and Silverdale/Newcastle; there are an estimated 632 properties in Newcastle and Silverdale at risk of surface water flooding¹¹. Cross-boundary flood impacts are an important consideration in Newcastle-under-Lyme Borough, particularly with regard to fluvial and surface water flooding.

¹¹ JBA Consulting (2019) Level 1 Strategic Flood Risk Assessment Final Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/282/level-1-strategic-flood-risk-assessment-report-october-2019> [Date accessed 28/05/24]

- D.2.2.8 The location of the proposed development under the three options is not specified, and as such it is uncertain to what extent new residents would be exposed to current sources of flood risk. The construction of new dwellings can exacerbate flood risk owing to the introduction of hardstanding and impermeable surfaces, but implementation of adaptive technologies can mitigate for this depending on the site-specific circumstances. Option 1 proposes fewer houses and so may potentially have less of an impact of flooding than Options 2 and 3; however, overall, the impact of all options is uncertain and would depend on location.

SA Objective 6 – Water

- D.2.2.9 New dwellings will require provision of clean water and the safe disposal of wastewater, and it is possible that allocating new homes in some locations may exceed the existing capacity of the available infrastructure. Development under any option would need to carefully consider the findings of the latest Water Cycle Study and relevant Water Resources Management Plans. New development has the potential to increase runoff during both construction and occupation of dwellings, which would potentially lead to adverse effects on the quality of above and below-ground watercourses. Option 1 would have a smaller resource requirement and potentially a lesser impact on water quality than Options 2 and 3 owing to fewer dwellings being built.

SA Objective 7 – Cultural Heritage

- D.2.2.10 There are 365 Listed Buildings, 13 Scheduled Monuments (SMs), two Registered Parks and Gardens (RPGs) and 21 conservation areas in Newcastle-under-Lyme, in addition to a range of non-designated historic features. Development in close proximity to cultural heritage features has the potential to adversely affect their setting. However, new development can also stimulate new investment and potentially enhance the local townscapes or improve the accessibility and appreciation of heritage assets. Overall, as the location, site context and proximity to receptors is unknown, the potential impacts of all the housing growth options on cultural heritage features is uncertain. Although, it is likely that pursuing a lower quantum of growth would have the greatest scope to avoid sensitive locations; as such, Option 1 could be seen as the better performing option.

SA Objective 8 – Landscape

- D.2.2.11 Outside of the main urban areas, the borough is dominated by undulating rural landscapes. The northern half of the borough is located within the Stoke-on-Trent Green Belt, where new development could harm the purposes of the Green Belt. The landscape character of the borough is described in the Landscape and Settlement Character Assessment (LSCA)¹² as being of 'moderate' or 'good' condition and 'moderate' or 'strong' character. The sensitivity of the settlement fringes was also assessed in the LSCA, and across the borough the sensitivity was classed as 'medium' or 'high'. Whilst the specific location and context of the proposed dwellings within each of the three housing growth options is not known, it is likely that all options would result in the need to develop outside of existing settlement boundaries to some extent, leading to a potential minor negative impact on the landscape. Option 1 proposes the fewest number of houses and so would likely produce the smallest impact on the landscape character of the region, whereas Option 3 would be likely to pose the largest impact as it proposes the highest number of new dwellings.

SA Objective 9 – Health & Wellbeing

- D.2.2.12 Across the borough, healthcare services are fairly well distributed with various GP Surgeries within the urban area of Newcastle-under-Lyme and the majority of outlying villages containing a GP Surgery. There is no hospital in the borough, but the Royal Stoke University Hospital is close to the borough boundary within Stoke-on-Trent. Although a large proportion of existing residents in the borough are located within the catchment area of some green spaces, the Open Space Assessment and Strategy identified that parks and garden provision is mainly located to the north of the borough, and there is a lack of provision and associated amenities in the rural south¹³. New development may put pressure on existing healthcare services and urban greenspaces, and could potentially lead to capacity issues if high density developments within existing urban settings are built, as well as potential negative effects on health associated with loss of or reduced access to outdoor space for exercise and recreation. All options increase housing numbers, although locations of these developments are not known. Overall, Option 1 proposes the fewest new houses and as such would place the least pressure on existing healthcare provisions; Options 2 and 3 include higher numbers of proposed dwellings placing the most pressure on existing provisions and may require additional resources to be delivered.

¹² Chris Blandford Associates (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/401/landscape-and-settlement-character-assessment-study-2022-part-1> [Date accessed: 28/05/24]

¹³ RSK Environmental Ltd (2022) Open Space and Green Infrastructure Strategy Final Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/480/open-space-and-green-infrastructure-strategy> [Date accessed: 28/05/24]

SA Objective 10 – Equality

- D.2.2.13 The Index of Multiple Deprivation (IMD) data shows the most deprived areas within the borough are centred around the town of Newcastle-under-Lyme, with the more rural areas having generally lower levels of deprivation. Growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing the accessibility to key services and employment. Although, this could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas. As the location, site context and proximity to receptors of the proposed housing provision is unknown, there is some uncertainty regarding the potential impacts of the three options on equality.
- D.2.2.14 All three housing options would meet the minimum local housing need of the local area (according to the standard method). Options 2 and 3 would meet the minimum local housing need, plus Option 2 allowing for an uplift in the working age population, and Option 3 would additionally meet the higher job-led scenario that would require additional housing to provide greater job creation, which could create additional households of various type and affordability. A major positive impact could be achieved for Options 2 and 3, and a minor positive impact for Option 1 that would meet the minimum local housing need, but would not meet the required growth under the job-led scenario.

SA Objective 11 – Transport & Accessibility

- D.2.2.15 The borough benefits from the presence of the M6 motorway to provide links with other major settlements, however there is only one train station and public satisfaction with travel information is low¹⁴. Accessible public transport is key to sustainable development and the location of potential new dwellings with regard to transport links is an important consideration. Developments close to or within existing urban settlements would be expected to have better access to the public transport network, and a reduced need to travel overall, in comparison to developments in more rural and potentially more isolated areas. Reliance on car journeys may be higher in rural areas possibly increasing air pollution levels and adversely affecting biodiversity. All three options have the potential to lead to a minor negative impact on transport and accessibility. It is anticipated that Options 2 and 3 would create a higher burden on the existing transport network than Option 1 due to the higher number of new dwellings, however there may be potential within these options to provide new public transport links leading to a benefit in the local area.

¹⁴ Newcastle-under-Lyme Borough Council (2021) Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed 28/05/24]

SA Objective 12 – Economy

- D.2.2.16 It is expected that accessibility from new residential developments to employment opportunities would be best across the northern part of the borough where there are good links into existing settlements including the main towns of Newcastle-under-Lyme and Kidsgrove. However, employment opportunities and transport links from the more rural southern part of the borough may be less numerous. Development focused within the existing urban area would be likely to provide the best access to the greatest range of employment opportunities as well as sustainable transport options, whereas developments in more rural areas may lead to increased travel and reliance on private cars to reach employment or retail opportunities.
- D.2.2.17 Under Option 1, the need for 347 homes could support the creation of approximately 167 jobs per annum, which falls short of the job growth envisaged by the HENAU. It is suggested from further modelling that the development of 400 dwellings proposed under Option 2 would meet the identified job growth and support the creation of 237 jobs per year, whereas Option 3 exceeds this. The development under Options 2 and 3 would be expected to retain existing residents and could attract new residents, in turn growing the size of the working age population and providing greater capacity to fill jobs. Despite this, Option 1 proposes the fewest number of houses and it is therefore possible that these dwellings could be centred around existing infrastructure and amenities (and therefore provide sustainable access to employment opportunities) to a greater extent than Options 2 and 3. Although, overall, all options could lead to a minor positive impact for this objective.

D.2.3 Conclusion

- D.2.3.1 **Table D.2.2** presents the high-level summary assessment scores for the three housing growth options, as explained in the narrative within **section D.2.2**.
- D.2.3.2 In general, a larger number of proposed dwellings would be more likely to lead to adverse effects particularly on environmentally-focused SA Objectives. Option 1 proposes the smallest housing number and is likely to perform the best against environmental objectives, whereas Option 3 performs the best with regard to equality and housing provision (SA Objective 10) as it exceeds the housing need, but this larger housing number performs less well against the environmental objectives.
- D.2.3.3 All three housing growth options propose a similar level of growth and perform similarly against the high-level SA scoring system, and all would satisfy the identified housing needs according to the standard method calculation. However, when factoring in the latest HEDNA information and the economic forecasts for the Plan area over the period 2020-2040, Options 2 and 3 emerge as the stronger choices. Option 2 could be identified as the best performing overall, seeking to provide the best balance between economic, social and environmental outcomes, through ensuring housing growth aligns with the economic and employment growth forecasts in contrast to Option 1, but providing a lower quantum of growth than Option 3 and thus reducing environmental impacts.

D.2.3.4 For impacts to be understood in relation to the baseline the environmental assessment needs to have details of size, nature and location of the proposals. However, these options focus on quanta alone which means that any attempt to evaluate impacts is necessarily high level and with restricted diagnostic conclusions.

Table D.2.2: Impact matrix of the three additional housing growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Housing Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	--	-	-	-	+/-	-	+/-	-	-	+	-	+
2	--	-	-	-	+/-	-	+/-	-	-	++	-	+
3	--	-	-	-	+/-	-	+/-	-	-	++	-	+

D.2.4 Selection and rejection

D.2.4.1 Reflecting on the SA findings and other relevant evidence base information, NuLBC have provided the following reasons for selection and rejection of the housing growth options as set out in **Table D.2.3**.

Table D.2.3: Selected and rejected housing growth options

Housing Growth Option	Dwellings per annum	Reasons for selection / rejection
1) Standard Method	347	This option has not been taken forward as it provides for a limited growth in the working age population aged 16-64. This level of growth is not considered to align with economic and employment growth forecasts for the Plan period up to 2040.
2) Standard Method Plus Uplift for Working Age Population	400	Option 2 has been taken forward as it has been informed by a Housing and Economic Needs Assessment. The figure is considered to be aligned with the economic jobs growth forecasts providing for an increase in the working age population. The option represents the most deliverable option when balanced against site opportunities and constraints in the Borough. Option 2 represents the best performing option in the SA in balancing economic, social and environmental outcomes through ensuring the housing option aligns and economic and employment forecasts.
3) Higher Growth Option	434	This represents the view of modelling forecasts which are considered to be the most optimistic of the forecasts. There is therefore some concern over the realism of this option, particularly when balanced against site opportunities and constraints in the Borough.

D.3 Assessment of Employment Growth Options

D.3.1 Preface

D.3.1.1 Paragraph 85 of the NPPF (2023) states that “*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*”, whilst PPG indicates that “*strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions*”¹⁵.

D.3.1.2 In 2020, Stoke-on-Trent City Council and NuLBC jointly prepared an economic assessment for their shared geographic area, to inform the former emerging Joint Local Plan. The Economic Needs Assessment (2020)¹⁶ identified an existing supply of 64.8ha of employment land within the borough and presented various scenarios which suggested that up to 56.6ha of employment land could be required over the period to 2037. Following the ending of work on the Joint Local Plan, this evidence was updated.

D.3.1.3 Based on information from the HEDNA Update for Newcastle-under-Lyme (2023)¹⁷, three reasonable alternatives for the levels of employment growth to be delivered through the new Local Plan were identified by NuLBC and evaluated in the Regulation 18 SA¹⁸. These three options related to variations on the standard housing method at the time of their evaluation, and modelled employment forecasts:

- Option 1: Standard Method – need of between 45.3-68.8ha employment land, equating to 269 jobs per annum;
- Option 2: Midpoint of employment forecasts – need of between 40.7-68.8ha employment land, equating to 207 jobs per annum; and
- Option 3: Highest employment forecast – need of between 36.5-68.8ha employment land, equating to 281 jobs per annum.

¹⁵ DLUHC and MHCLG (2020) Planning Practice Guidance: Housing and economic needs assessment. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 28/05/24]

¹⁶ Turley (2020) Economic Needs Assessment: Newcastle-under-Lyme & Stoke-on-Trent. June 2020. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/261/housing-and-economic-needs-assessment-2020> [Date accessed: 28/05/24]

¹⁷ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

¹⁸ Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volumes 1-3. May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 06/06/24]

- D.3.1.4 Since the Regulation 18 consultation, a further HEDNA Update for Newcastle-under-Lyme has been prepared in April 2024¹⁹, which suggests that the employment land supply as of March 2023 is now reduced to 48ha, and the updated scenarios indicate a likely requirement for between 43 and 83ha of employment land for the updated Local Plan period to 2040.

Employment Growth Options

- High-level options for the scale of employment growth to be delivered through the new Newcastle-under-Lyme Local Plan
- Growth Options lack any spatial detail

- D.3.1.5 The three reasonable alternative options for the quanta of employment growth identified by NuLBC at this stage of the plan making process, following on from the three options considered at the Regulation 18 stage, are presented in **Table D.3.1**.

Table D.3.1: Newcastle-under-Lyme Employment Growth Options identified by NuLBC at the Regulation 19 stage

Employment growth option	Need	Supply (ha)	Job growth supported per annum
1. Standard Method	43ha	48ha	167 jobs
2. Standard Method plus uplift for working age population	63-83ha	48ha	237 jobs
3. Higher growth option	83ha	48ha	347 jobs

- D.3.1.6 **Table D.3.2** summarises the likely impacts of each employment growth option in relation to the 12 SA Objectives. The text within **section D.3.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.
- D.3.1.7 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by NuLBC, as well as expert judgement. The growth options relate to quanta only and do not include any spatial information.

¹⁹ Turley (2024) Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 04/07/24]

D.3.2 Assessment

SA Objective 1 – Climate Change

- D.3.2.1 All three employment growth options are likely to have a minor negative impact on climate change as increased development would lead to a potential increase in carbon and GHG emissions through both construction and occupation of new employment development, although the extent and nature of such emissions would be dependent upon the specific employment uses, which are unknown. Option 1 would potentially produce the smallest increase in emissions as it has the lowest employment land need figure and, without knowledge of the associated specific land uses, could be seen as the best performing option in this respect.
- D.3.2.2 The potential for new development under any growth option to draw on renewable or low-carbon energy supplies is not known. Similarly, opportunities to link with sustainable travel networks and reduce reliance on private cars are not known at this scale of assessment.

SA Objective 2 – Air

- D.3.2.3 Air quality and particularly NO₂ concentration is of primary concern in Newcastle-under-Lyme, sources of which include the burning of petrol and diesel, which is primarily used for road transport, of which 45% of emissions come from motorways crossing the region²⁰. There are currently three AQMAs declared in the borough. Air pollution may be affected by commuting to employment sites; however, depending on the location of the proposed employment sites, public transport or active travel routes may be able to be utilised for commuter travel, reducing potential emissions from vehicles. As the details are not known at this stage and increased commuting is expected with all the options to some extent, a minor negative impact on air quality is likely.

SA Objective 3 – Biodiversity, Flora and Fauna

- D.3.2.4 The borough contains a range of biodiversity designations and features including sections of the Midland Meres and Mosses Phase 1 and Phase 2 Ramsar sites, as well as a number of SSSIs, LNRs and LWSs, and across the region there are areas of low, medium and high habitat distinctiveness. There are priority woodland, grassland, marsh and heathland habitats as well as ancient woodlands within the borough. As the supply figure for all three options is the same they may all have similar impacts on biodiversity, flora and fauna depending on the locations of the proposed developments. All options would be likely to lead to the loss of undeveloped land to some extent, and may place pressure on biodiversity assets, including through reductions in air quality and water quality/quantity and habitat fragmentation, with potential to result in a minor negative impact on biodiversity. Option 3 seeks a higher growth scenario and therefore may result in the greatest pressure, and Option 1 comparatively least.

²⁰ Newcastle-under-Lyme Borough Council (2021) Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed 28/05/24]

SA Objective 4 – Natural Resources & Waste

- D.3.2.5 The majority of the land within Newcastle-under-Lyme borough is classified as ALC Grade 3, although there are pockets of Grade 2 land in the south. Development within the existing urban area would not result in loss of BMV land, however, as the location of the proposed employment growth under the three options is not known, their impact on BMV land is uncertain. MSAs are present across the borough, and development within these areas would potentially lead to sterilisation of mineral resources. All three employment growth options have the same supply figure, but the location and nature of the sites under each option is unknown. These options are anticipated to produce a negative impact overall, owing to the probable use of previously undeveloped land to some extent. Option 1 will potentially utilise less land than the other two options given its lower need figure.

SA Objective 5 – Flooding

- D.3.2.6 Historic flooding records highlight the risk from the Lyme Brook, culverted watercourses and surface water; the areas most affected have been Kidsgrove and Silverdale/Newcastle²¹. Since employment development locations are not known, it is unclear what effect each employment growth option may have on flooding. There is potential for green infrastructure to be incorporated into the design of employment sites to reduce any potential surface water flooding. However, any new built footprint associated with the new economic development can increase the risk of flooding under either of the three options. Overall, the impact on flooding is uncertain for all options.

SA Objective 6 – Water

- D.3.2.7 New employment development sites will require water and wastewater provision, although depending on the location of the proposed developments this could be incorporated into the existing infrastructure, but it could also increase demand. Water-saving options could be integrated into designs to help reduce water usage. The supply figure for all three employment growth options is the same but the locations of the development sites is not known. All options would be likely to increase the demand for water to some extent, so a negative impact is anticipated overall in the absence of any available information to demonstrate water neutrality principles.

SA Objective 7 – Cultural Heritage

- D.3.2.8 There are 365 Listed Buildings, 13 SMs, two RPGs and 21 conservation areas in Newcastle-under-Lyme, in addition to a range of non-designated historic features. Overall, as the location, site context and proximity of new employment development to receptors is unknown, the potential impacts of the three employment growth options on cultural heritage features is uncertain.

²¹ JBA Consulting (2019) Level 1 Strategic Flood Risk Assessment Final Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/282/level-1-strategic-flood-risk-assessment-report-october-2019> [Date accessed 28/05/24]

SA Objective 8 – Landscape

- D.3.2.9 Outside of the main urban areas, the borough is dominated by undulating rural landscapes. As the specific location, layout and design of the proposed employment developments are not known their impact on the local landscape character is uncertain. Whilst the specific location and context of the proposed employment sites within each of the three options is not known, it is likely that all options would result in the need to develop outside of existing settlement boundaries to some extent, leading to potential for a minor negative impact on the landscape overall. The lower need figure suggested under Option 1 may therefore result in lesser adverse effects than the other two options which strive for higher growth.

SA Objective 9 – Health & Wellbeing

- D.3.2.10 The development locations for the three employment growth options are not known, but it is not expected that associated development would increase the provision of healthcare facilities within the borough, nor should they result in the loss of healthcare facilities. Consequently, all three options would be likely to have a negligible impact on health and wellbeing in the borough.

SA Objective 10 – Equality

- D.3.2.11 IMD data shows the most deprived areas within the borough are centred around the town of Newcastle-under-Lyme, with the more rural areas having less deprivation. Employment growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing the accessibility to employment opportunities; however, this strategy could also lead to exacerbation of existing inequalities in some instances, for example by leading to densification and greater pressure on existing open spaces to be converted into employment land. Option 3 is likely to perform the best since it has the potential to deliver the highest uplift in job creation.

SA Objective 11 – Transport & Accessibility

- D.3.2.12 Transport is an enabler of economic activity; employment sites close to or within existing urban settlements would have greater access to the transport network in comparison to more rural developments. The Office for National Statistics (ONS) data shows private cars were the most used mode of transport to travel to work²². Urban developments may have better access to existing public transport links or active travel routes, and so reliance on commuting by car could be reduced and active travel options may be promoted more successfully. The locations of the proposed employment development are unknown and so the impact the three options may have on transport links and public transport is uncertain. As all the options have potential to increase traffic and congestion in the borough, a minor negative effect has been identified.

²² Office for National Statistics (2020) Coronavirus and Travel to Work: June 2020. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/coronavirusandtraveltowork/june2020> [Date accessed: 28/05/24]

SA Objective 12 – Economy

- D.3.2.13 It is expected that employment growth would benefit the economy and the local population providing more job options and opportunities. All three options would increase the number and potentially choice of jobs within the borough, having a major positive effect on the economy. Whilst all options perform well, Option 3 is likely to perform the best since it has the potential to deliver the highest uplift in job creation at 347 jobs per annum, in contrast to 167 and 237 jobs per annum for Options 1 and 2, respectively.

D.3.3 Conclusion

- D.3.3.1 **Table D.3.2** presents the high-level summary assessment scores for the three employment growth options, as explained in the narrative within **section D.3.2**.

- D.3.3.2 All three employment growth options are based on the same employment land supply figure of 48ha, based on the latest HEDNA evidence, but propose differing employment need figures ranging between 43ha and 83ha. The three options perform similarly against the high-level SA scoring system, and all would support the creation of at least 167 jobs per annum which equates to the job growth associated with the minimum actual need for 347 homes (based on the standard housing method calculation – see **Chapter D.2**).

- D.3.3.3 There are a number of uncertain variables associated chiefly with size, nature and location which limit the ability of the SA to make firm conclusions with respect of several environmental variables. However, in terms of social and economic benefits, it is likely that Option 3 will deliver the highest level of sustainability performance with its ability to deliver the highest potential job growth.

Table D.3.2: *Impact matrix of the three employment growth options*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Employment Growth Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	-	-	-	-	+/-	-	+/-	-	0	+	-	++
2	-	-	-	-	+/-	-	+/-	-	0	+	-	++
3	-	-	-	-	+/-	-	+/-	-	0	+	-	++

D.3.4 Selection and rejection

- D.3.4.1 Reflecting on the SA findings and other relevant evidence base information, NuLBC have provided the following reasons for selection and rejection of the employment growth options as set out in **Table D.3.3**.

Table D.3.3: *Selected and rejected employment growth options*

Employment Growth Option	Job growth per annum	Reasons for selection / rejection provided by NuLBC
1) Standard Method	43ha / 167 jobs	This option has not been taken forward as it provides for a limited growth in the working age population aged 16-64. This level of growth is not considered to align with economic and employment growth forecasts for the Plan period up to 2040.
2) Standard Method Plus Uplift for working age population	63-83ha / 237 jobs	Option 2 has been taken forward as it has been informed by a local needs assessment, conducted using the standard method. The figure is considered to be aligned with the economic job's growth forecasts providing for an increase in the working age population. The option represents the most deliverable option when balanced against site opportunities and constraints in the Borough.
3) Higher Growth Option	83ha / 347 jobs	This represents the view of one forecast from modelling and is considered to be the most optimistic of the forecasts. There is therefore some concern over the realism of this option, particularly when balanced against site opportunities and constraints in the Borough.

D.4 Assessment of Growth Direction Option Zero

D.4.1 Preface

D.4.1.1 The Regulation 18 consultation version of the local plan included a total of six 'growth direction options'. These were identified by NuLBC and evaluated in the SA. The six options relate to potential broad locations for strategic development sites around key locations in the borough.

- Growth Direction Option 1: Large rural extensions outside the Green Belt;
- Growth Direction Option 2: Green Belt release in the University Growth Corridor;
- Growth Direction Option 3: Green Belt release in Talke and Chesterton;
- Growth Direction Option 4: Green Belt release in Kidsgrove;
- Growth Direction Option 5: Green Belt release in Audley; and
- Growth Direction Option 6: Combination of rural extensions and Green Belt release across the borough.

Growth Direction Option

- Broad locations for new development sites for consideration in the Local Plan

D.4.1.2 As part of the identification, description and evaluation of reasonable alternatives, NuLBC has subsequently identified an additional growth direction option called 'Growth Direction Option Zero: Maximising development in development boundaries. Growth Direction Option Zero was identified at the Issues and Options (2022)²³ stage as a source of land for development, and has now subsequently been incorporated into assessments to assist in understanding the evolution of the growth direction options. The description of this option is presented in **Table D.4.1**.

Table D.4.1: Newcastle-under-Lyme Growth Direction Option Zero identified by NuLBC

Option	Description of Growth Direction Option
Growth Direction Zero	Maximising development at sites within development boundaries, including density uplift within town centres and at locations well served by public transport. The Option has the potential to deliver approximately 2,500 dwellings.

²³ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan 2020 – 2040 Issues and Strategic Options. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/514/issues-and-options> [Date accessed: 08/07/24]

D.4.1.3 Growth Direction Option Zero has been assessed using the SA Framework and summary findings are presented in **Table D.4.2**. Full explanations and reasonings behind each score are set out for each SA Objective in **section D.4.2**.

D.4.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by NuLBC, as well as expert judgement.

D.4.2 Assessment

SA Objective 1 - Climate Change

D.4.2.1 In 2019, Newcastle-under-Lyme Borough Council declared a Climate Emergency. The development of 2,500 dwellings is likely to increase GHG emissions during the construction and occupation of development, as well as embodied carbon associated with the energy used to extract, produce and transport the materials needed. The urban heat island effect will be exacerbated by the increase in higher density development. Development will therefore benefit from including green infrastructure, street tree planting, and green technologies such as green roofs to ensure both cooling within the urban area and also ensure development does not increase the risk of flooding (see also Flooding **D.4.2.12**). However, by maximising development within development boundaries and ensuring development is well served by public transport, transport-related emissions from private car use will decrease. Facilitating sustainable transport will align with advice from the Climate Change Committee which advises development plans or transport plans to deliver a 33-35% shift from cars to walking/cycling/public transport²⁴. The potential for new development under Option 0 to draw on renewable or low-carbon energy supplies is not known. Overall, a minor negative impact on climate change is identified.

SA Objective 2 – Air

D.4.2.2 The option will lead to new development being located within existing built development boundaries and town centres. New development is therefore likely to coincide with the borough's three AQMAs, leading to impacts on air quality and probably exacerbating existing poor air quality in these areas.

D.4.2.3 The availability of existing public transport links will help reduce car use and associated generation of air pollution associated with internal combustion engines of private cars that are fuelled by petrol or diesel. The option could realistically achieve public transport enhancements where appropriate by virtue of existing networks.

²⁴ Local Authorities and the Sixth Carbon Budget. Climate Change Committee. December 2020. Available at: <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/> [Date accessed: 01/07/24]

- D.4.2.4 The preferred choice of travel within Newcastle-under-Lyme is travel by private car²⁵, with road transport also accounting for the highest proportion of fuel consumption in the borough (41%)²⁶. Introducing the required infrastructure to support electric vehicles within the urban area, which will encourage the uptake in electric vehicles and could lead to reduced ownership of vehicles fuelled by petrol or diesel.
- D.4.2.5 On balance, accepting that approximately 2,500 new homes in an urban area will increase road traffic frequency and density most likely leading to congestion, a minor negative impact is identified for Option Zero.
- D.4.2.6 See also Health and Population (**D.4.2.17**) for related links to transport.

SA Objective 3 – Biodiversity

- D.4.2.7 The borough contains a range of biodiversity designations and features including sections of the Midland Meres and Mosses Phase 1 and Phase 2 Ramsar sites, as well as a number of SSSIs, LNRs and LWSs. Across the borough there are areas of low, medium and high habitat distinctiveness including priority habitats such as deciduous broad-leaved woodland, grassland, marsh and heathland as well as ancient woodlands.
- D.4.2.8 Development will be located within existing development boundaries and utilise previously developed land to some extent. A benefit of this approach will be that development is located away from sensitive habitats that are to be found in wider areas of countryside, away from main settlements. This helps to reduce impacts such as habitat fragmentation and disturbance to species assemblages and populations.
- D.4.2.9 Urban areas can also support distinctive habitats and important species, as well as have good overall levels of biodiversity which is appreciated by people as well as providing an important component of the wider ecological network. The urban focus associated with Growth Option Zero could potentially lead to pressure on existing greenspaces, cumulatively leading to a reduction in habitats and biodiversity within the urban area as well as the potential loss of corridors or connections between habitats, despite any biodiversity net gain (BNG) provisions at the site level, owing to the large scale of development proposed and the expected requirement of undeveloped land.
- D.4.2.10 Overall, a minor negative impact on biodiversity is identified.

²⁵ ONS (2021). Method used to travel to work. Available at:
<https://www.ons.gov.uk/datasets/TS061/editions/2021/versions/1/filter-outputs/8378d897-7e3e-4c53-9938-f7df417d920f#get-data> [Date accessed: 01/07/24]

²⁶ Department for Energy Security and Net Zero & Department for Business, Energy and Industrial Strategy (2023) UK local authority and regional greenhouse gas emissions and national statistics 2005 – 2021. Available at:
<https://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics>
[Date accessed: 01/07/24]

SA Objective 4 – Natural Resources

- D.4.2.11 The majority of the land within the borough is classified as ALC Grade 3, although there are pockets of Grade 2 land in the south. MSAs are present across the borough, including urban areas such as Newcastle-under-Lyme town centre and Kidsgrove town centre, and development within these areas could potentially lead to sterilisation of mineral resources, although there may be limited opportunities for future extraction in existing urban areas. Development which is located within existing development boundaries reduces land-take in the open countryside avoiding loss of ecologically or environmentally valuable soil. Overall, a minor positive impact on the retention of the borough's natural resources is identified.

SA Objective 5 – Flooding

- D.4.2.12 Historic flooding records highlight the risk of flooding associated with the Lyme Brook, culverted watercourses and surface water; the areas most affected have been Kidsgrove and Silverdale/Newcastle²⁷. The specific location of the development is not specified and as such it is uncertain to what extent new residents would be exposed to current sources of flood risk, although areas such as Newcastle-under-Lyme town centre is subject to some flood risk associated with the Lyme Brook. Growth Direction Option Zero will lead to large scale development and construction of new buildings that will likely exacerbate existing flood risk due to the introduction of hardstanding and impermeable surfaces; but implementation of adaptive technologies can mitigate this depending on site-specific circumstances.

SA Objective 6 – Water

- D.4.2.13 Development likely to result from Growth Direction Option Zero will increase the pressure on water resources and wastewater infrastructure in the area and should therefore be considered alongside the findings of the latest Water Cycle Study and relevant Water Resources Management Plans. New development will need to meet and where possible exceed the minimum building regulations requirements and seek opportunities to benefit from water recycling and wastewater heat recovery systems to recover heat from hot water. It is likely that the scale of development will increase runoff during both construction and occupation, which will potentially lead to adverse effects on the quality of above and below-ground watercourses that can result in poorer water quality to users. Climate change is likely to exacerbate these issues, owing to unpredictable patterns of precipitation. A minor negative impact is identified on water quality and resources as a result of development likely to result from Growth Direction Option Zero.

²⁷ JBA Consulting (2019) Level 1 Strategic Flood Risk Assessment Final Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/282/level-1-strategic-flood-risk-assessment-report-october-2019> [Date accessed 28/05/24]

SA Objective 7 – Cultural Heritage

- D.4.2.14 There are 365 Listed Buildings, 13 SMs, two RPGs and 21 conservation areas in Newcastle-under-Lyme, in addition to a range of non-designated historic features. The high density and urban focus of development within town centres will give rise to potential adverse effects on the urban heritage assets and their settings. Higher density development could include tall buildings, likely to lead to negative adverse effects on the setting of heritage assets and views to / from landmarks. However, opportunities for the proposed development at the site-level to enhance the local townscape or improve the accessibility and appreciation of heritage assets is likely. Overall, a minor negative impact on cultural heritage is expected under Option Zero, but with careful planning and design positive effects could be achieved in the longer term.

SA Objective 8 – Landscape

- D.4.2.15 Development likely to result from Growth Direction Option Zero will be located within existing development boundaries and will be likely to safeguard the openness of the surrounding landscape and the role of the Green Belt in preserving the setting and character of towns. Although, increasing development within the urban area could lead to changes in the character and identity of settlements. Additionally, there may be some potential for small-scale urban sprawl as a result of maximising development within boundaries where areas of undeveloped land or less dense development are currently present at settlement edges. These effects could adversely affect important landscape features that contribute to identified landscape character types evaluated within the Newcastle-under-Lyme Landscape and Settlement Character Assessment Study (2022)²⁸, for example from the North, South and East Kidsgrove Coalfield Farmlands which are the three landscape character types surrounding Kidsgrove. High density development likely to result from Growth Direction Option Zero will also place pressure on open spaces and GI that can contribute to local townscape character. Although there may be some localised opportunities to improve the character of townscapes through redevelopment schemes, overall, a minor negative impact is identified (SA Objective 8).

²⁸ Newcastle-under-Lyme Borough Council (2022). Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Part 1 Landscape & Settlement Character Assessment. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/1065/lca-part-1> [Date accessed: 01/07/24]

SA Objective 9 – Health and wellbeing

- D.4.2.16 Across Newcastle-under-Lyme, various healthcare services including GP surgeries are distributed within the urban area. Development likely to result from Growth Direction Option Zero will be located within existing development boundaries that are generally located within sustainable distances to healthcare facilities. Furthermore, the development will be located in close proximity to existing transport infrastructure, enabling residents to have access to public transport and encourage active modes of travel by locating site end users close to local services. However, the large scale of development may place additional pressure on open spaces and local services depending on their specific location. Furthermore, as discussed within section **D.4.2.1 (Climate Change)** and **D.4.2.2 (Air)** the large scale of development will expose residents to poorer air quality as a result of both the construction of the development and transport related emissions. On balance, owing to sustainable access healthcare facilities and facilitating sustainable and active modes of transport a minor positive impact is identified for health and wellbeing.

SA Objective 10 – Equality

- D.4.2.17 The Index of Multiple Deprivation (IMD) data²⁹ shows the most deprived areas within the borough are centred around the town of Newcastle-under-Lyme, with the more rural areas having generally lower levels of deprivation. Development likely to result from Growth Direction Option Zero will be directed towards the existing urban areas and could potentially help to facilitate social inclusion by increasing the accessibility to key services and employment, where rural areas tend to have poorer accessibility to services based on minimum travel times than urban areas when using public transport or walking³⁰. Furthermore, the provision of approximately 2,500 dwellings under this option will also be expected to provide some affordable housing, however this option alone will not meet the identified housing need and other sources of housing supply such as Duty to Co-operate (DtC) contributions from neighbouring authorities will need to be explored. The high density of development under this option could provide lower standard of housing quality and limit access to open spaces. On balance, in terms of the potential of this option to provide sustainable access to local services, a minor positive impact on equality is identified.

²⁹ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 01/07/24]

³⁰ DEFRA (2019). Overall measure of accessibility of services – 2019. Available at: www.gov.uk/government/statistics/rural-transport-travel-and-accessibility-statistics/overall-measure-of-accessibility-of-services-2019--2 [Date accessed: 01/07/24]

SA Objective 11 – Transport and accessibility

- D.4.2.18 The borough benefits from the presence of the M6 motorway to provide links with other major settlements, however there is only one train station and public satisfaction with travel information is low³¹. Accessible public transport is key to sustainable development and the location of potential new dwellings with regard to transport links is an important consideration. Growth Direction Option Zero is likely to locate development close to or within existing urban settlements that would be expected to have better access to the public transport network, and a reduced need to travel overall, in comparison to developments in more rural and potentially more isolated areas. Locating development within sustainable access to the local transport network will reduce the reliance on private car use to access services and employment opportunities, reducing congestion in the area. However, the increased scale of development will likely lead to placing additional pressure on existing transport networks and public transport, which could result in increased congestion issues along key transport routes. On balance, a minor positive impact is identified for transport and accessibility.

SA Objective 12 – Economy

- D.4.2.19 Development likely to result from Growth Direction Option Zero will be located within existing development boundaries that will likely be located within sustainable distance to a range of existing employment opportunities within urban settlements, including within Newcastle-under-Lyme town centre and Kidsgrove town centre. Furthermore, the development will be likely to be well served by existing public transport infrastructure and could facilitate active modes of travel, allowing sustainable access to employment opportunities. A minor positive impact on employment and the economy is identified.

D.4.3 Conclusion

- D.4.3.1 **Table D.4.2** presents the high-level summary assessment scores for Growth Direction Option Zero as explained in the narrative within **section D.4.2**.
- D.4.3.2 Development likely to result from Growth Direction Option Zero will locate site end users within sustainable distance to local services, employment opportunities, healthcare facilities and public transport, scoring positively against SA Objectives 9 (health and wellbeing), 10 (equality), 11 (transport and accessibility), and 12 (economy). Development is likely to be located within existing development boundaries and as a result protect undeveloped, rural land in the Plan area, scoring positively against SA Objective 4 (natural resources).
- D.4.3.3 The large scale of growth expected to be delivered and increase in urban density will have potential adverse effects across several SA Objectives, with expected increased GHG emissions, reductions in air quality, loss of biodiversity, altering of the landscape character, changes to the setting of heritage assets and reductions in water quality (SA Objectives 1, 2, 3, 6, 7 and 8). The impact on flooding (SA Objective 5) in the area is uncertain, owing to the unknown site-specific locations.

³¹ Newcastle-under-Lyme Borough Council (2021) Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed 28/05/24]

D.4.3.4 In respect to efficient use of land, access to local services and encouraging public transport, Growth Direction Option Zero is likely to perform better than Options 1-6 (assessed in the Regulation 18 SA) as a large proportion of development is likely to be located within existing development boundaries. However, uncertainty remains in regard to the capacity of services and infrastructure to deal with the expected growth and will not meet the needs alone, relying on DtC.

Table D.4.2: Impact matrix showing summary scores associated with the SA performance of Growth Direction Option Zero

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Growth Direction Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
0	-	-	-	+	+/-	-	-	-	+	+	+	+

D.4.4 Selection and rejection

D.4.4.1 Reflecting on the SA findings and other relevant evidence base information, NuLBC have provided the following reasons for selection and rejection of the growth direction options as set out in **Table D.4.3**.

Table D.4.3: Selected and rejected growth direction options

Growth direction options	Reason for selection / rejection
O) Maximising development at sites within development boundaries, including density uplift within town centres and at locations well served by public transport. The Option has the potential to deliver approximately 2,500 dwellings.	Option zero has not been progressed in its current form as it does not meet the identified development requirements in the Borough. It is known also that there is limited supply within the development boundary of the urban area and that the edge of Newcastle-under-Lyme and Kidsgrove are bounded by the Green Belt on all sides. There is limited brownfield land opportunities available. The principle of maximising development at sites within development boundaries are also reflected in options 1-6.
1) Development on strategic sites outside the greenbelt – Large rural extensions	Option 1 has not been progressed due to concerns over delivering sustainable patterns of development. Option likely to require considerable highways and other infrastructure investment and could potentially lead to congestion and air pollution. The option does not support the strategic objectives of the Plan in preserving the rural character of villages as it would result in significant levels of development being directed to rural areas of the Borough. There are also deliverability concerns in respect of identifying suitable site options. This option would safeguard Green Belt land but may have an indirect impact upon openness of areas in the Green Belt.
2) Strategic Green Belt release for an urban extension – University Growth Corridor	Option 2 has not been progressed due to concerns over delivering sustainable patterns of development by focusing significant growth in one area of the Borough. The option would also have an impact on the Green Belt and may require investment in infrastructure. There would be strategic transport implications. There may also be landscape impacts. However, it is noted that the strategic objectives of the Plan support the growth of Keele University.
3) Green Belt release for development of strategic sites – Talke and Chesterton expansion	Option 3 has not been progressed due to concerns over delivering sustainable patterns of development by focusing significant growth in one area of the Borough. It is also acknowledged that there are potential impacts on Green Belt land and strategic transport implications of significant growth along the A500 / A34 Talke roundabout junction. There

Growth direction options	Reason for selection / rejection
	are also potential heritage concerns with impacts on Wedgewood Monument (Grade II listed) and Talke also has a Conservation Area. There are also concerns relating to the deliverability of this option given multiple land ownerships and contamination concerns due to former industrial uses.
4) Green Belt release for development of strategic sites – Kidsgrove expansion	This option has not been progressed due to concerns over delivering sustainable patterns of development by focusing significant growth in one area of the Borough. This option would result in a loss of Green Belt land and there are concerns over the deliverability of this option given multiple land ownerships and also topography and legacy of industrial uses. There are also concerns over the strategic transport implications of this option.
5) Green Belt release for development of strategic sites – Audley Rural expansion	This option has not been progressed due to concerns over delivering sustainable patterns of development by focusing significant growth in one area of the Borough. There are concerns over significant levels of development having potential impacts on the rural road network potentially leading to increased congestion and air pollution. There are also heritage impacts on the Audley Conservation Area as well as the Wedgewood Monument. There are also concerns over changes to the settlement form and character of a rural settlement.
6) Combination of strategic sites across the Borough comprising of both sites outside the Green Belt and sites which require Green Belt release	Option 6 (hybrid approach) has been progressed as it represents a balanced approach that seeks to support development in the strategic and urban centres whilst supporting a smaller scale of development in the rural areas to support sustainable patterns of development across the borough. Option 6 also reflects the outcomes of Option Zero as a 'starting point' i.e. it has sought to maximise brownfield land opportunities / land within development boundaries first before looking at site options outside of existing development boundaries.

D.5 Assessment of Growth Scenarios

D.5.1 Preface

- D.5.1.1 Following the six identified 'growth direction options' identified by the council at the Regulation 18 stage and additional growth direction option at the Regulation 19 stage, NuLBC have identified four 'growth scenarios' that underpin 'growth direction option 6'.
- D.5.1.2 At the Regulation 18 stage, the Council confirmed that 'growth direction option 6' was to be progressed as it represents a balanced approach that seeks to support development in the strategic and urban centres whilst supporting a smaller scale of development in the rural areas to support sustainable patterns of development across the borough.
- D.5.1.3 The Regulation 18 SA acknowledged the difficulties in determining an overall best performing growth direction option, concluding the following:
- D.5.1.4 *"...Option 6 is associated with uncertainty owing to the distributed nature of the potential locations for growth direction. The option has the potential to perform well but lacks definition. Conversely, it is possible that Options 2 or 4 may deliver the highest number of positive sustainability benefits and therefore can be considered to be the best performing option overall. Whilst these options would utilise undeveloped land they provide easy access into Newcastle-under-Lyme town with potential for existing public transport links with the university to be utilised. There is potential for employment opportunities associated with the University Growth Corridor and there are other nearby existing infrastructure and amenities which could be incorporated into or built upon by this option, including renewable energy schemes.*
- D.5.1.5 *It is worth considering however, that a further refined hybrid option be prepared that seeks to capture the best of all options, wherever possible. This is possible through refinement and clarification of Option 6."*
- D.5.1.6 Following the Regulation 18 consultation, and review of the latest evidence base information as well as engagement with key stakeholders and statutory consultees, further consideration was given to whether there are further reasonable alternative growth scenarios to consider and appraise through the preparation of the Local Plan.

Growth Scenario Options

- Consideration of how the overall scale of growth could be strategically distributed as a distinct spatial expression

- D.5.1.7 NuLBC has identified four further options, or 'growth scenarios', which relate to the selected Growth Direction Option 6, to explore further alternatives based around new proposed employment allocations including strategic employment sites. The four new growth scenarios are set out in **Table D.5.1**.

Table D.5.1: Newcastle-under-Lyme Growth Scenario Options identified by NuLBC

Growth scenario option	Employment land supply	Strategic employment sites	Gross employment land supply
Growth Scenario 6a	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> No strategic sites. 	69.6ha
Growth Scenario 6b	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) KL15 Land South of A525 between Keele University and Newcastle (13ha) 	104.6ha
Growth Scenario 6c	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) TK30 Land off Talke Road and A500, Talke (51ha) 	142.6ha
Growth Scenario 6d	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> KL15 Land South of A525 between Keele University and Newcastle (13ha) TK30 Land off Talke Road and A500, Talke (51ha) 	133.6ha

D.5.1.8 Each option has been assessed using the SA Framework and summary findings are presented in **Table D.5.2**. Full explanations and reasonings behind each score are set out for each SA Objective in **section D.5.2**.

D.5.1.9 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by NuLBC, as well as expert judgement.

D.5.2 Assessment

SA Objective 1 – Climate Change

D.5.2.1 Under all options, increased development will lead to a potential increase in carbon and GHG emissions through both construction and occupation of new employment development, including through increases in traffic, although the extent and nature of such emissions will be dependent upon the specific employment uses, which are unknown.

- D.5.2.2 Under Option 6a, employment land supply sites BW1 and KL13 coincide with regions of less constrained 'potential opportunity areas for Low and Zero Carbon (LZC)'. The development proposed in these areas may have more potential to draw energy supply from decentralised, renewable, or low carbon energy systems. However, under Option 6a site TC7 coincides with County Council-owned 'LZC opportunity areas', indicating that the proposed development on the site could result in the loss of land with high potential suitability for renewable energy developments. In addition to the employment land supply (as set out under Option 6a), Options 6b, 6c and 6d will provide growth at strategic employment sites, all coinciding with regions of less constrained 'potential opportunity areas for LZC'.
- D.5.2.3 Overall, despite the potential opportunities for drawing on renewable or low carbon energy sources, Options 6b, 6c and 6d are likely to result in a minor negative impact on climate change owing to the likelihood of increased road-based transport emissions associated with the new employment growth, particularly at the strategic employment sites. Whereas, Option 6a could be the best performing in this regard, without a focus on large sites adjacent to the strategic road network and associated increase in emissions; on balance, a negligible impact is identified for Option 6a.

SA Objective 2 – Air

- D.5.2.4 Air quality and particularly NO₂ concentration is of primary concern in Newcastle-under-Lyme, sources of which include the burning of petrol and diesel, which is primarily used for road transport, of which 45% of emissions come from motorways crossing the region³². There are currently three AQMAs declared in the borough. Sites BW1, TC45 and TC7 within the employment land supply are located within an AQMA, situating site end users under all options in areas of existing poor air quality and potentially exacerbating air pollution in these areas through new development and increased traffic. Furthermore, under all options, a proportion of development will be located within 200m of a main road, potentially exposing site end users to higher levels of transport associated air pollution. On the other hand, many of the sites within the employment land supply and the strategic employment sites will provide good sustainable transport connections and access to the cycle network and public footpaths, promoting sustainable and active modes of travel for commuters and reducing potential emissions from vehicles to some extent. On balance, a minor negative impact on air quality is expected across all options.
- D.5.2.5 As Option 6a proposes the least amount of employment land, it could be expected to have a lesser impact on air quality than Options 6b, 6c and 6d.

³² Newcastle-under-Lyme Borough Council (2021) Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed 28/05/24]

SA Objective 3 – Biodiversity, Flora and Fauna

- D.5.2.6 The borough contains a range of biodiversity designations and features including sections of the Midland Meres and Mosses Phase 1 and Phase 2 Ramsar sites, as well as a number of SSSIs, LNRs and LWSs, and across the region there are areas of low, medium and high habitat distinctiveness. There are priority woodland, grassland, marsh and heathland habitats as well as ancient woodlands within the borough. Under all options, it is likely that the proposed development will place pressure on biodiversity assets, including through reductions in air quality and water quality/quantity and habitat fragmentation, owing to the majority of development being located on undeveloped land. This includes the potential for direct adverse effects on priority habitats and areas of high habitat distinctiveness, based on the location of sites which form the employment land supply, which is common for all options, and as such a minor negative impact on biodiversity is identified. As option 6a proposes the lowest total amount of employment land, it could expect to have a lesser impact than options 6b, 6c, and 6d on biodiversity.

SA Objective 4 – Natural Resources & Waste

- D.5.2.7 The majority of the land within Newcastle-under-Lyme Borough is classified as ALC Grade 3, although there are pockets of Grade 2 land in the south. MSAs are present across the borough, and development within these areas could potentially lead to sterilisation of mineral resources. Under Options 6a and 6d development is likely to coincide with MSAs and result in the loss of a proportion of ALC Grade 3 land. Options 6b and 6c equally include development that coincides with MSAs and will result in the loss of a significant amount of ALC Grade 3 land, owing largely to the proposed development at strategic site AB2. Overall, all options are expected to have a minor negative impact on natural resources and waste. Options 6a and 6d are expected to perform better than Options 6b and 6c under this objective, owing to a relatively smaller proportion of ALC Grade 3 land being lost.

SA Objective 5 – Flooding

- D.5.2.8 Historic flooding records highlight the risk from the Lyme Brook, culverted watercourses and surface water; the areas most affected have been Kidsgrove and Silverdale/Newcastle³³. Under Option 6b and 6c, strategic employment site AB2 is partially located within Flood Zone 2 and 3 where there is potential for a negative impact on fluvial flooding in the area and downstream as a result of introducing new built form. Options 6a and 6d include development located wholly within Flood Zone 1 and will likely locate site end users away from areas at risk of fluvial flooding. Surface water flood risk is prevalent across the borough, with all options likely to include some development in areas at high risk of surface water flooding where there is potential to exacerbate surface water flood risk on site and in the surrounding area. Overall, a minor negative impact is expected across all options. Owing to Options 6a and 6d locating growth wholly within Flood Zone 1, these options are identified to perform better than Options 6b and 6c with regard to flooding.

³³ JBA Consulting (2019) Level 1 Strategic Flood Risk Assessment Final Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/282/level-1-strategic-flood-risk-assessment-report-october-2019> [Date accessed 28/05/24]

SA Objective 6 – Water

- D.5.2.9 New employment development sites will require water and wastewater infrastructure provision, and should be considered in light of the findings of the latest Water Cycle Study and relevant Water Resources Management Plans. New development under any option has potential to increase runoff during both construction and occupation, which would potentially lead to adverse effects on the quality of above and below-ground watercourses. Under Options 6b and 6c, development at the strategic employment site AB2 could result in the increased risk of groundwater contamination, where a large proportion of site AB2 is located within SPZ 3. A minor negative impact on water quality is identified under options 6b and 6c. The development included within options 6a and 6d is less likely to impact water quality in the area, and therefore an overall negligible impact on water is identified.

SA Objective 7 – Cultural Heritage

- D.5.2.10 There are 365 Listed Buildings, 13 SMs, two RPGs and 21 conservation areas in Newcastle-under-Lyme, in addition to a range of non-designated historic features. Under all four options, the proposed development has potential to result in adverse effects on the character and setting of heritage assets including listed buildings within Newcastle Town Centre Conservation Area. Additionally, development under all four options has the potential to result in significant adverse effects on RPGs, where site KL13 partially coincides with Keele Hall RPG. Overall, under all four options a minor negative impact on cultural heritage is identified, where development could adversely affect the setting of heritage assets. Although, there may be some opportunities for the proposed development at the site-level to enhance the local townscape or improve the accessibility and appreciation of heritage assets. There are no identified heritage designations in close proximity to strategic employment site AB2, and as such, the proposed development under Options 6b and 6c which focus a proportion of growth at this site, could lead to less potential for adverse effects on cultural heritage in comparison to Option 6d.

SA Objective 8 – Landscape

- D.5.2.11 Outside of the main urban areas, the borough is dominated by undulating rural landscapes. The strategic employment sites proposed within Options 6b, 6c, and 6d comprise large areas of undeveloped land, the majority of which currently comprise agricultural land uses. The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA³⁴, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development and TK30 within an area of 'medium' sensitivity. The northern half of the borough is located within the Green Belt, where under Options 6b, 6c and 6d, strategic employment sites AB2 and TK30 are located within areas classified as making a 'moderate' overall contribution to the purposes of the Green Belt (and KL15 'weak') according to the latest Green Belt Assessment information (2024)³⁵. Under all four options, adverse effects on landscape sensitivity, urban sprawl and coalescence are also possible, owing to the location of the proposed development within the employment land supply and the strategic employment sites outside of the existing settlement boundaries. Overall, under all options, the proposed development is expected to result in a minor negative impact on the landscape character. Option 6a is likely to perform the best in regard to landscape, as it would include the least quantum of growth in areas identified to be sensitive to new development.
- D.5.2.12 It may be possible to reduce some adverse effects through exploring opportunities to introduce new landscape features to compensate for loss or degradation elsewhere as a result of the proposed development, in accordance with the recommendations of the LSCA.

SA Objective 9 – Health & Wellbeing

- D.5.2.13 It is not expected that associated development under all four options will increase the provision of healthcare facilities within the borough, nor should they result in the loss of healthcare facilities. However, the large quantum of development could place additional pressure on existing open spaces depending on the specific location and nature of development. Overall, it is expected that development under all four options will have a negligible impact on health and wellbeing in the borough.

³⁴ Chris Blandford Associates (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/401/landscape-and-settlement-character-assessment-study-2022-part-1> [Date accessed: 28/05/24]

³⁵ ARUP (2024) Newcastle-under-Lyme Council Green Belt Site Review: Consolidated Report. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 04/07/24]

SA Objective 10 – Equality

- D.5.2.14 The development under all four options will help to facilitate social inclusion by increasing the provision of, and accessibility to, employment opportunities. Options 6b, 6c and 6d will likely perform better than Option 6a since these three options have the potential to deliver higher uplift in job creation, owing to the provision of a greater proportion of employment land. Options 6b and 6d would potentially provide further benefits associated with the development of strategic employment site KL15, supporting development within the University of Keele Growth Corridor with associated benefits for employment skills and training opportunities. Overall, a major positive impact on equality is identified for Options 6b and 6d and a minor positive impact is identified for Options 6a and 6c.

SA Objective 11 – Transport & Accessibility

- D.5.2.15 Data from ONS shows private cars were the most used mode of transport to travel to work³⁶. The strategic employment sites are well connected to transport infrastructure. Under all four options, site end users will have strong access to existing public transport links or active travel routes, and so reliance on commuting by car could be reduced and active travel options may be promoted more successfully. However, the overall quantum of development proposed under the four options, and in particular for the strategic employment sites under Options 6b, 6c and 6d, will be expected to increase traffic and congestion in the borough and could place pressure on existing public transport links. Overall, Options 6b, 6c and 6d are identified to have a minor negative impact on transport and accessibility, whereas Option 6a may be more likely to result in an overall negligible impact on balance.

SA Objective 12 – Economy

- D.5.2.16 Under all four options, the expected employment growth proposed will significantly benefit the economy and local population, providing more job options and opportunities. Options 6b, 6c and 6d perform comparatively better than Option 6a, owing to the provision of a larger proportion of employment land and exceeding the required employment land need of 83ha for the updated Local Plan period to 2040³⁷. The provision of strategic employment sites under Options 6b, 6c and 6d may also lead to a greater range of job opportunities across different sectors, and boost the borough's economic competitiveness with neighbouring authorities. Overall, a major positive impact is identified for Options 6b, 6c and 6d, and a minor positive impact is identified for Option 6a.

D.5.3 Conclusion

- D.5.3.1 **Table D.5.2** presents the high-level summary assessment scores for the four growth scenario options, as explained in the narrative within **section D.5.2**.

³⁶ Office for National Statistics (2020) Coronavirus and Travel to Work: June 2020. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/coronavirusandtraveltowork/june2020> [Date accessed: 28/05/24]

³⁷ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at:

- D.5.3.2 All options will support the creation of employment opportunities, therefore scoring positively against SA Objectives 10 (equality) and 12 (economy). When compared to the other options, Option 6a performs slightly worse in regard to the creation of employment opportunities (SA Objective 12), falling slightly short of the 83ha of employment land requirement identified within the HEDNA. Options 6b and 6d will provide additional benefits in regard to employment opportunities owing to the higher level of growth, including within the University of Keele Growth Corridor, and are therefore identified as better performing options than 6a and 6c under SA Objective 10 (equality).
- D.5.3.3 The large quantum of growth proposed under all four options will have potential adverse effects across several SA Objectives, owing to loss of previously undeveloped land with implications for ecological networks and landscape settings, reduction in air quality associated with new growth, possible exacerbation of flood risk, and changes to the setting of heritage assets (SA Objectives 2, 3, 4, 5, 7 and 8). The development under Options 6b and 6d is likely to have greater potential for adverse effects on water quality (SA Objective 6), owing to the location of the proposed development within groundwater SPZ 3, although it is acknowledged that all options may give rise to increased risks of water pollution in general.
- D.5.3.4 Although Option 6c has the potential to deliver the highest quantum of employment floorspace, Options 6b and 6d will support development within the University of Keele Growth Corridor, with associated benefits for employment skills and training opportunities. As such, Options 6b and 6d are identified as the best performing overall.

Table D.5.2: *Impact matrix of the four Growth Scenario Options*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Growth Scenario Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
6a	0	-	-	-	-	0	-	-	0	+	0	+
6b	-	-	-	-	-	-	-	-	0	++	-	++
6c	-	-	-	-	-	-	-	-	0	+	-	++
6d	-	-	-	-	-	0	-	-	0	++	-	++

D.5.4 Selection and rejection

D.5.4.1 Reflecting on the SA findings and other relevant evidence base information, NuLBC have provided the following reasons for selection and rejection of the growth scenario options as set out in **Table D.5.3**.

Table D.5.3: *Selected and rejected growth scenario options*

Growth scenario option	Associated sites	Reasons for selection / rejection
1) Growth Scenario 6a	No Strategic Sites	This option has not been taken forward as it does not support the anticipated jobs growth over the Plan period. The Strategic Employment Sites Study (Aspinall Verdi) considers that there is a case for the allocation of strategic sites in the Borough
2) Growth Scenario 6b	Strategic Sites AB2 / KL15	This option has been taken forward as it supports the anticipated level of employment / jobs growth in the borough. The Strategic Employment Sites Study considers that there is a case for the allocation of sites AB2 and KL15 in the Local Plan. Option 6(b) is one of two options (along option 6(c)) which performs best through the SA.
3) Growth Scenario 6c	Strategic Sites AB2 / TK30	This option has not been taken forward. Although in a quantitative sense, the amount of development would support the anticipated level of employment jobs growth in the borough it would not support the University Growth Corridor and would require the release of Green Belt land.
4) Growth Scenario 6d	Strategic Sites KL15 and TK30	This option has not been taken forward. Although in a quantitative sense, the amount of development would support the anticipated level of employment jobs growth in the borough the Strategic Employment Sites Study has identified that the TK30 site is not suitable for allocation as a Green Belt site at this time.

D.6 Assessment of Safeguarded Land Options

D.6.1 Preface

D.6.1.1 In March 2024, NuLBC commissioned Arup to prepare additional Green Belt evidence to accompany their emerging Local Plan. Following on from the Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1 (2017)³⁸ and Part 2 (2020)³⁹, and Part 3 of the Green Belt Assessment⁴⁰ (which included advice of safeguarded land), the further Safeguarded Land Advice (2024)⁴¹ explored whether it is necessary and how to determine the quantum and location of safeguarded land. This advice has been used by NuLBC to identify three safeguarded land options presented in **Table D.6.1**.

Safeguarded Land Options

- High level options for the need to safeguard land for future development

D.6.1.2 The Newcastle-under-Lyme Green Belt covers the entire northern half of the authority area and is contiguous with the Green Belt in Cheshire East Council to the north and Stafford Borough Council to the south.

D.6.1.3 The location of new development under the 'no safeguarded land' scenario within Option 1 is unknown, and to some extent so is the location of development under Options 2 and 3, although it is expected that safeguarded land under Options 2 and 3 will be located in accordance with the requirements within the NPPF (paragraph 148)⁴² where it states that when defining Green Belt boundaries plans should *"where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet long-term development needs stretching well beyond the plan period"*.

³⁸ Arup (2017) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1, November 2017. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 11/06/24]

³⁹ Arup (2020) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 2, December 2020. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 11/06/24]

⁴⁰ Arup (2023) Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 3, June 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 11/06/24]

⁴¹ Arup (2024) Green Belt Safeguarded Land Advice, Draft – 13 May 2024.

⁴² DLUHC (2023) National Planning Policy Framework, December 2023. Paragraph 148. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 12/06/24]

Table D.6.1: Newcastle-under-Lyme Safeguarded Land Options identified by NuLBC

Safeguarded land option	Associated housing growth	Additional information
1. Safeguarded Land – None identified	0	This option is not to identify safeguarded land. This option is informed by factors suggesting it may not be necessary to identify safeguarded land.
2. Safeguarded Land – 5 years project forward	1,561.5 – 1,800 dwellings	<ul style="list-style-type: none"> Projecting forward 5 years of development requirement (for housing only) The range represents the standard method calculation outcome of 347 (lower) and then the 400 housing requirement figure (higher) The range also includes a reduction of 10% as outlined in the attached report
3. Safeguarded Land – 7.5 years project forward	2,342.25 – 2,700	<ul style="list-style-type: none"> Projecting forward 7.5 years of development requirement The range represents the standard method calculation outcome of 347 (lower) and then the 400 housing requirement figure (higher) The range also includes a reduction of 10% as outlined in the attached report

D.6.2 Assessment

D.6.2.1 Under Options 2 and 3, land will be safeguarded to provide for a significant proportion of housing growth beyond the Plan period. This will provide clarity regarding sources of future development sites for consideration, allowing more certainty that future residents can be provided with a good mix of housing type and affordability to meet their needs. Under Option 1, without safeguarding land for development, this could potentially result in new development coming forward in less sustainable locations, and less provision of affordable homes due to a potentially lower supply of housing. Overall, a minor positive impact is identified for Options 2 and 3 against SA Objective 10 (equality) and a minor negative impact is identified for Option 1.

D.6.2.2 Under Options 2 and 3 the safeguarding of land for new housing development will mean there is less likelihood of future Green Belt reviews being required, thereby helping to protect Green Belt boundaries beyond the Plan period, maintaining the Green Belt's role in providing separation between urban settlements and protecting the landscape setting and distinctiveness of the area. However, based on the NPPF definitions, safeguarded land is expected to comprise previously undeveloped land between the existing urban area and the Green Belt, and as such under Options 2 and 3 it is likely that there will be loss of undeveloped land which will result in potential adverse impacts on the landscape setting to some extent. In addition, the loss of undeveloped land will give rise to potential adverse impacts on local wildlife and biodiversity, due to the loss of ecological corridors and habitats. Development under Options 2 and 3 could also potentially result in increased GHG emissions through both construction and occupation of new development, as well as reductions in air quality and increased demand on water resources, especially when considering the likely location of safeguarded land outside of existing settlements and away from current infrastructure. Overall, minor negative impacts are identified for Options 2 and 3 against climate change, air quality, biodiversity, natural resources, water quality and landscape character (SA Objectives 1, 2, 3, 4, 6 and 8).

- D.6.2.3 Under Option 1, no land will be safeguarded for future development; therefore, Green Belt boundaries will be more vulnerable to change. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and can support landscape-scale biodiversity networks. New development under Option 1 has the potential for significant adverse impacts on the rural landscape setting and local distinctiveness and could lead to reduced separation between the urban areas. Overall, a major negative impact on the local landscape (SA Objective 8) is identified for Option 1. The unknown nature of the scale and location of development under Option 1 results in uncertainty in relation to SA Objectives 1, 2, 3, 4, 6 and 8.
- D.6.2.4 Options 2 and 3 would safeguard rural, undeveloped land that will be located outside of the existing urban area. Future residents are likely to be located beyond sustainable distances to the current local services including public transport, healthcare facilities and employment opportunities. Furthermore, development in these locations could result in the loss of open space, reducing present and future residents' access to open spaces, that provide both health and wellbeing benefits. Overall, a minor negative impact on health and wellbeing (SA Objective 9), access to sustainable transport (SA Objective 11) and employment opportunities (SA Objective 12) is identified for Options 2 and 3. The location and nature of development under Option 1 is unknown and therefore the impact of development across these three SA Objectives is uncertain.
- D.6.2.5 The location of the proposed development under the three options is not specified, and as such it is uncertain to what extent new residents would be exposed to current sources of flood risk (SA Objective 5). As the location of the three options is unknown, the potential impacts of all the safeguarded land options on cultural heritage features are uncertain (SA Objective 7).

D.6.3 Conclusion

- D.6.3.1 **Table D.5.2** presents the high-level summary assessment scores for the three safeguarded land options, as explained in the narrative within **section D.5.2**.
- D.6.3.2 Options 2 and 3 perform similarly against the high-level SA scoring system. Both will increase the future housing land supply which is expected to provide a greater mix of housing types including affordable housing, with Option 3 likely performing better overall given it would safeguard land for a longer period of time. However, Options 2 and 3 are likely to result in adverse effects on environmental objectives to some extent, owing to the loss of undeveloped land. All three options are identified to result in adverse effects on the surrounding landscape owing to the undeveloped, rural nature of the development, although Option 1 is more likely to give rise to significant adverse effects on the landscape when compared to Options 2 and 3, owing to the higher probability of Green Belt release under Option 1.
- D.6.3.3 There is greater uncertainty in regard to the location and nature of development included within Option 1 and this has resulted in uncertain impacts being identified across the majority of SA Objectives. Without safeguarding land, there is less certainty regarding the future development pattern, and there will potentially be higher reliance on windfall developments, and increased pressure for development in less sustainable locations further from existing centres.

D.6.3.4 Further assessment will be needed to provide clarity in this evaluation as the relative sustainability performance will depend on the specific location of the land to be safeguarded under Options 2 and 3, which is unknown at present.

Table D.6.2: *Impact matrix of the three Safeguarded Land Options*

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Safeguarded Land Option	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	--	+/-	-	+/-	+/-
2	-	-	-	-	+/-	-	+/-	-	-	+	-	-
3	-	-	-	-	+/-	-	+/-	-	-	+	-	-

D.6.4 Selection and rejection

D.6.4.1 Reflecting on the SA findings and other relevant evidence base information, NuLBC have provided the following reasons for selection and rejection of the safeguarded land options as set out in **Table D.6.3**.

Table D.6.3: *Selected and rejected safeguarded land options*

Safeguarded Land Option	Reasons for selection / rejection
Safeguarded Land – none identified	<p>This option has been taken forward for the following reasons:-</p> <p>There is significant uncertainty at a national level which presents difficulties in robustly establishing housing and employment needs beyond the end of the plan period</p> <p>In accordance with national policy, there needs to be a robust exceptional circumstances case to amend the Green Belt to provide for safeguarded land. Given the significant uncertainty in establishing housing and employment needs beyond the end of the plan period, the council considers that there is not an exceptional circumstances case.</p> <p>The local plan proposes a degree of flexibility. It is considered that this flexibility in housing supply will contribute to needs beyond the end of the plan period.</p> <p>The proposed spatial strategy for employment includes a supply which will contribute to needs beyond the end of the plan period. Therefore, there is no need to safeguarded land for employment.</p> <p>In relation to housing site options there are insufficient available Green Belt options to 'safeguard' to provide 5 – 10 years housing land supply beyond the plan period.</p> <p>Reforms are anticipated to the planning system including in relation to plan making which may require an early review of the local plan. On this basis the spatial strategy may need to be reviewed in the short term in a different legislative context. Therefore, the requirement for safeguarded land is uncertain.</p>
Safeguarded Land – 5 years project forward	See above for reasons why not taken forward
Safeguarded Land – 7.5 years project forward	As above for reasons why not taken forward

Appendix E: Site Assessment Methodology and Assumptions

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E.1 Introduction

E.1.1 Overview

- E.1.1.1 This appendix provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the methodology used to assess reasonable alternative sites within the emerging Newcastle-under-Lyme Local Plan.
- E.1.1.2 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process for reasonable alternative sites. There are also a number of assumptions and limitations noted within each of the following sections, which should be borne in mind when considering the assessment findings.
- E.1.1.3 The topic-specific methodologies set out in **Boxes E.2.1** to **E.13.1** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 4.4** of the main Regulation 19 SA (see **Volume 2**).
- E.1.1.4 All distances stated in site assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.
- E.1.1.5 **Appendix F** sets out the full appraisal of the reasonable alternative sites which have been identified and evaluated at the Regulation 19 stage. **Appendix G** presents a summary of the assessment findings for all reasonable alternative sites that have been evaluated in the SA process, including from the Regulation 18 SA and the additional sites as presented in **Appendix F**. The appraisal evaluates the likely significant effects of each reasonable alternative against the 12 SA Objectives.
- E.1.1.6 The level of detail that can be expressed through the SA assessments depends on the level of detail provided associated with the part of the plan in question.

E.2 SA Objective 1: Climate Change

E.2.1.1 The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk (see SA Objective 5). It should help to shape places in ways that contribute to radical reductions in greenhouse gas (GHG) emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

E.2.1.2 **Box E.2.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Climate Change.

E.2.2 Renewable energy

E.2.2.1 Sites will be considered for energy generating potential against the findings of the Staffordshire County-wide Climate Change Adaption and Mitigation Study (2020)¹. Spatial data indicating the areas with opportunities to draw energy supply from decentralised, renewable or low carbon energy supply systems have been provided by the Council.

E.2.3 GHG emissions

E.2.3.1 It is likely that new development would result in an increase in local GHG emissions due to the increase in the local population and the number of operating businesses. The increase in GHG emissions caused by new developments is often associated with impacts of the construction phase, the occupation and operation of homes and businesses, fuel consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.

E.2.3.2 It should be noted that the appraisal of reasonable alternative sites is limited in its assessment of carbon / GHG emissions. In the absence of site-specific carbon footprint data, and at this stage of the assessment process, the likely emissions arising from each reasonable alternative site is uncertain.

E.2.3.3 The incorporation of green infrastructure (GI) within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the 'urban heat island' effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel^{2,3}. Such opportunities will be evaluated through the policy assessments (see strategic and development management policies within **Appendix G** and site-specific policies within **Appendix J**).

¹ AECOM (2020) Climate Change Adaptation & Mitigation: Final Report. Staffordshire County Council. 20th November 2020. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/262/climate-change-adaptation-and-mitigation-report-2020> [Date accessed: 07/06/24]

² TCPA (2023) What is Green Infrastructure? Available at: <https://www.tcpa.org.uk/what-is-green-infrastructure/> [Date accessed: 07/06/24]

³ RSK (2022) Newcastle-under-Lyme Borough Council Open Space and Green Infrastructure Strategy: Final report, April 2022. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/480/open-space-and-green-infrastructure-strategy> [Date accessed: 07/06/24]

Box E.2.1: SA Objective 1: Climate Change strategic assessment methodology

SA1 Receptor	++	+	0	+/-	-	--
Opportunities for renewable and low carbon energy generation / use.	The proposed development will deliver renewable and low carbon energy and/or associated infrastructure.	Development located in area with known opportunities to draw energy supply from decentralised, renewable, or low carbon energy supply systems.	N/A	The effect of the proposed development with regard to renewable or low carbon energy opportunities is uncertain, or dependent upon implementation.	Development will sterilise land with high potential suitability for renewable energy scheme.	Development of site will result in a loss of a renewable energy scheme in use.

E.3 SA Objective 2: Air

E.3.1.1 **Box E.3.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Air.

E.3.2 Exposure to sources of air pollution

E.3.2.1 Exposure of new residents to air pollution has been considered in the context of the development proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads (motorways and A-roads). It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway⁴⁵. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that “*beyond 200 m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant*”⁶. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers⁷⁸.

E.3.2.2 Development proposals located within 200m of a main road or AQMA would be expected to have a minor negative impact on site end users’ exposure to air pollution. Development proposals located over 200m from a main road or AQMA would be expected to have a negligible impact on site end users’ exposure to air pollution.

E.3.2.3 The assessments have used UK AQMA data available from Defra⁹, and road data available from the Ordnance Survey¹⁰.

E.3.3 Generation of air pollution

E.3.3.1 It is likely that new development would result in an increase in traffic and thus traffic-generated air pollution. Both existing and future site users would be exposed to this change in air quality.

⁴ Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: <https://www.standardsforhighways.co.uk/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date accessed: 07/06/24]

⁵ Design Manual for Roads and Bridges (2020) LA 104 Environmental assessment and monitoring. Available at: <https://www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a> [Date accessed: 07/06/24]

⁶ Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: <https://www.gov.uk/government/publications/tag-unit-a3-environmental-impact-appraisal> [Date accessed: 25/04/23]

⁷ Bignal, K., Ashmore, M & Power, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁸ Ricardo-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

⁹ Department for Environment Food and Rural Affairs (2024) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 07/06/24]

¹⁰ Ordnance Survey (2023) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 07/06/24]

E.3.3.2 It should be noted that the appraisal of reasonable alternative sites is limited in its assessment of air pollution. In the absence of site-specific emissions data or information relating to the number of cars likely to be associated with new development sites, at this stage of the assessment process the likely air pollution impacts arising from each reasonable alternative site is uncertain.

E.3.3.3 Proposals which would help to reduce the number of cars used, promote the use of low emission vehicles, public transport and active travel and reduce congestion on nearby roads would help to reduce air pollution and improve air quality. Such opportunities will be evaluated through the policy assessments (see strategic and development management policies within **Appendix G** and site-specific policies within **Appendix J**).

Box E.3.1: SA Objective 2: Air strategic assessment methodology

SA2 Receptor	++	+	0	+/-	-	--
AQMA	N/A	Development proposals will improve air quality within AQMA.	Development proposals are located over 200m from an AQMA.	N/A	Development proposals are located within, or within 200m of, an AQMA.	N/A
Main road	N/A	Development proposals will improve air quality in proximity to main roads.	Development proposals located over 200m from a main road.	N/A	Development proposals located within 200m of a main road.	N/A

E.4 SA Objective 3: Biodiversity, Flora and Fauna

E.4.1.1 The biodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area. Receptors include the following:

- **Designated Sites:**
 - European sites (including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites).
 - Sites of Special Scientific Interest (SSSI).
 - National Nature Reserves (NNR).
 - Local Nature Reserves (LNR).
 - Local Wildlife Sites (in Staffordshire, these are known as Sites of Biological Importance (SBI) and Biodiversity Alert Sites (BAS)¹¹).
 - Regionally Important Geological Sites (RIGS).
- **Habitats and Species:**
 - Ancient woodland.
 - Priority habitats.

E.4.1.2 **Box E.4.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, Flora and Fauna.

E.4.1.3 Data for European sites, SSSIs, NNRs, ancient woodlands and LNRs is available from Natural England¹². Data for SBIs, BASs, RIGS and Habitat Distinctiveness has been provided by the Council.

¹¹ According to Staffordshire Wildlife Trust (2016) The State of Staffordshire's Nature 2016 Technical Report, "*Local Wildlife Sites in Staffordshire are broken down into two categories: Sites of Biological Importance (SBI) and Biodiversity Alert Sites (BAS) based on their diversity when scored against the Selection Criteria for Local Wildlife Site Selection in Staffordshire. SBI's are more diverse and are generally considered of county importance, whereas BAS's are less diverse but still possess some biological interest and are generally considered more locally important.*" Available at: <https://www.staffs-wildlife.org.uk/sites/default/files/2018-12/State%20of%20Staffs%20technical%20report%20compressed.pdf> [Date accessed: 07/06/24]

¹² Natural England (2024) Natural England Open Data Geoportal. Available at: <https://naturalengland-defra.opendata.arcgis.com/> [Date accessed: 07/06/24]

E.4.2 Biodiversity and geodiversity designations

- E.4.2.1 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).
- E.4.2.2 Negative impacts would be expected where the following ecological designations may be harmed or lost as a result of proposals: SPAs, SACs, Ramsar sites, SSSIs, ancient woodlands, NNRs, LNRs, SBIs and BASs as well as priority habitats protected under the 2006 NERC Act¹³. The assessment is largely based on a consideration of the proximity of a site to these ecological receptors. For SSSIs, the assessment has used Impact Risk Zone (IRZ) information¹⁴.

E.4.3 European sites

- E.4.3.1 European sites (sometimes referred to as Habitats sites) provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of SACs, designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and SPAs, classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive). Additionally, paragraph 181 of the NPPF requires that sites listed under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be given the same protection as fully designated European sites.
- E.4.3.2 The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a European site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each European site (its qualifying features) and pathways via which the Local Plan may have an impact. At this stage, no ZOI have been formally identified for surrounding European sites, and so at this stage of the assessment process, the potential impact of each development site is uncertain. It should be noted that the impact of proposed sites on European sites will be tested through the Habitats Regulations Assessment (HRA) process, the findings of which have been used to inform the Regulation 19 SA. The HRA will provide further detail relating to potential impacts on European sites within and surrounding the Plan area.

¹³ Natural Environment and Rural Communities Act 2006. Available at:
<http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed: 07/06/24]

¹⁴ IRZs are a Geographical Information System (GIS) tool developed by Natural England which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

E.4.4 Priority habitats, species and ecological networks

- E.4.4.1 For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England’s publicly available Priority Habitat Inventory database¹⁵. It is acknowledged this may not reflect current local site conditions in all instances.
- E.4.4.2 It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as due to the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 4) in this assessment.
- E.4.4.3 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.
- E.4.4.4 Protected species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.
- E.4.4.5 It is anticipated that the Council will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.
- E.4.4.6 It is assumed that mature trees and hedgerows will be retained where possible.

E.4.5 Habitat distinctiveness

- E.4.5.1 Habitat distinctiveness across the borough has been mapped by Staffordshire Wildlife Trust and Staffordshire Ecological Record using Phase 1 habitat data and with reference to guidance provided in the Biodiversity Net Gain Metric 3.1¹⁶. Five distinctiveness bands have been identified: Very High, High, Medium, Low and Very Low.
- E.4.5.2 Habitat distinctiveness relates to:
- Identifying areas of high biodiversity value which are a priority for protection and expansion;
 - Flagging areas that may contain medium value (semi-natural) habitat, where biodiversity offsetting/compensation may be required if they are developed; and

¹⁵ Natural England (2024) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 07/06/24]

¹⁶ Staffordshire Wildlife Trust & Staffordshire Ecological Record (2023) Newcastle Borough Council Nature Recovery Network Mapping: Final Report, January 2023.

- Identifying possible wildlife corridors which can be highlighted and designated as part of a local plan/GI Strategy, which could be the target of restoration projects/funding/aspirational opportunity areas funded through development compensation.

E.4.5.3 Development proposals located in areas of 'Very High' or 'High' distinctiveness would be expected to result in a major negative impact on the biodiversity objective, those within 'Medium' distinctiveness a minor negative impact, and within 'Low' or 'Very Low' a negligible impact would be anticipated.

E.4.5.4 Spatial data for habitat distinctiveness has been provided by the Council.

E.4.5.5 The Local Plan should also seek to ensure that consideration is given to the emerging Nature Recovery Network for Staffordshire and opportunities for habitat and biodiversity enhancement. The emerging Nature Recovery Network will seek to "*achieve a resilient and healthy environment rich in wildlife with ecological security for people*"¹⁷. At this stage of the assessment process, no information has been available to inform the assessment of each site with regard to nature recovery opportunities.

Box E.4.1: SA Objective 3: Biodiversity, Flora and Fauna strategic assessment methodology

SA3 Receptor	++	+	0	+/-	-	--
European site (SAC, SPA, Ramsar)	N/A	Development proposal which would be expected to enhance features within a European site.	Development not anticipated to result in adverse impacts on European sites.	Development located outside of a recognised ZoI where, in absence of HRA conclusions, the effect of development is uncertain.	Development proposal is located within a recognised ZoI or similar spatial catchment relative to the European site. Likelihood of direct or indirect impacts.	Development proposal coincides with, or is located in close proximity to, a European site. Likelihood of direct impacts.
SSSI and IRZ	N/A	Development proposals which would enhance features of an SSSI.	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.	It is uncertain whether the proposed development would affect an SSSI.	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.	Development coincides with, or is located adjacent to, an SSSI. Likelihood of direct impacts.

¹⁷ Staffordshire Wildlife Trust (2024) Managing the wider countryside. Available at: <https://www.staffs-wildlife.org.uk/what-we-do/protecting-wildlife-and-wild-places/managing-wider-countryside> [Date accessed: 07/06/24]

SA3 Receptor	++	+	0	+/-	-	--
NNR	N/A	Development proposals which would enhance or create an NNR.	Development not anticipated to result in adverse impacts on NNRs.	It is uncertain whether the proposed development would affect an NNR.	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.	Development coincides with an NNR. Likelihood of direct impacts.
Ancient woodland	N/A	Development proposals which would enhance ancient woodland.	Development proposal would not be anticipated to impact ancient woodland.	It is uncertain whether the proposed development would affect an ancient woodland.	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
LNR	N/A	Development proposals which would enhance or create an LNR.	Development proposal not anticipated to result in adverse impacts on an LNR.	It is uncertain whether the proposed development would affect an LNR.	Development proposal could potentially result in adverse impacts on an LNR, such as those which are located in close proximity. Likelihood of direct or indirect impacts.	Development proposal anticipated to result in significant adverse impacts on an LNR, such as those which coincide. Likelihood of direct impacts.
Local Wildlife Site (SBI / BAS)	N/A	Development proposals which would enhance or create an SBI or BAS.	Development not anticipated to result in adverse impacts on an SBI or BAS.	It is uncertain whether the proposed development would affect an SBI or BAS.	Development proposal anticipated to result in adverse impacts on an SBI or BAS, such as those which are located adjacent or in close proximity. Likelihood of direct or indirect impacts.	Development proposal anticipated to result in significant adverse impacts on an SBI or BAS, such as those which coincide. Likelihood of direct impacts.

SA3 Receptor	++	+	0	+/-	-	--
Priority habitat	N/A	Development proposals which enhance or create a priority habitat.	Development proposal does not coincide with a priority habitat.	It is uncertain whether the proposed development would affect a priority habitat.	Development proposal coincides with a priority habitat.	N/A
RIGS	N/A	Development proposal anticipated to enhance RIGS.	Development proposal not anticipated to result in adverse impacts on RIGS.	It is uncertain whether the proposed development would affect RIGS.	Development proposal coincides with RIGS.	N/A
Habitat distinctiveness	N/A	Development proposal located outside of distinctive areas.	Development proposal where a proportion of the site is in area of 'low' or 'very low' distinctiveness.	N/A	Development proposal where a proportion of the site is in area of 'medium' distinctiveness.	Development proposal where a proportion of the site is in area of 'high' or 'very high' distinctiveness.

E.5 SA Objective 4: Natural Resources and Waste

E.5.1.1 This SA Objective recognises the economic and environmental benefits of conserving natural resources and material assets. The Local Plan should seek to conserve the best and most versatile agricultural land, seeking opportunities for remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, as well as supporting a reduction in waste generation and promote increased recycling and reuse of materials.

E.5.1.2 **Box E.5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Natural Resources and Waste.

E.5.2 Previously developed land

E.5.2.1 Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF¹⁸. Assessment of current land use and potential environmental value has been made through reference to aerial photography and the use of Google Maps. It should be noted that this may not reflect the current status of the site, and the nature of development within the site boundary is unknown, so a degree of uncertainty remains.

E.5.2.2 In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.

E.5.2.3 Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in Newcastle-under-Lyme. Development proposals situated on previously undeveloped land would be expected to pose a threat to soil within the site perimeter due to excavation, compaction, erosion and an increased risk of pollution and contamination during construction.

E.5.2.4 In addition, development proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect under this objective.

¹⁸ Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 07/06/24]

E.5.3 Agricultural Land Classification

- E.5.3.1 The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the 'best and most versatile' (BMV) land¹⁹. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land.
- E.5.3.2 Adverse impacts are expected for development proposals which would result in a net loss of agriculturally valuable soils. Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan area's BMV land, would be expected to have a minor negative impact for this objective.
- E.5.3.3 Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural' and would therefore help prevent the loss of the Plan area's BMV land, would be expected to have a minor positive impact for this objective.
- E.5.3.4 For the purpose of this assessment, a 20ha threshold has been used based on available guidance²⁰. Development proposals which would result in the loss of less than 20ha of greenfield land which is potentially BMV would be expected to have a minor negative impact on this objective. Development proposals which would result in the loss of 20ha or more of greenfield land which is potentially BMV would be expected to have a major negative impact on this objective.

E.5.4 Mineral Resources

- E.5.4.1 Mineral Safeguarding Areas (MSAs) designated by minerals planning authorities cover known deposits of minerals which should be safeguarded from unnecessary sterilisation by non-mineral development. Infrastructure sites used for the 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.
- E.5.4.2 Where a development proposal coincides with an identified MSA, as set out in the Minerals Local Plan²¹, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals will be inaccessible for potential extraction in the future. This could therefore result in an adverse impact under the natural resources SA objective. Data for MSAs has been provided by the Council.

¹⁹ MAFF. October 1988. Available at Natural England.

<http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 07/06/24]

²⁰ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 07/06/24]

²¹ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/mineralsLocalPlan.aspx> [Date accessed: 07/06/24]

E.5.5 Contaminated land

- E.5.5.1 Contaminated land is land that has been polluted and is therefore potentially unsafe for development unless the contamination is removed.
- E.5.5.2 In accordance with the NPPF, the Local Plan should “*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*”.
- E.5.5.3 It is assumed that the Council will ensure appropriate remediation of all development sites with contamination issues, prior to occupancy. As such, for the purposes of this assessment, a major positive impact would be expected where proposed sites coincide with contaminated land, providing opportunities for remediation, improving soil quality and resulting in an efficient use of land. It is assumed that historic landfill sites are likely to have residual ground contamination issues.
- E.5.5.4 Data for contaminated land and historic landfill sites has been provided by the Council.

E.5.6 Waste

- E.5.6.1 Waste management is jointly coordinated by the Staffordshire Joint Waste Management Board (JWMB) which incorporates Staffordshire County Council, Stoke-on-Trent City Council and the eight districts and boroughs within Staffordshire, including NuLBC. Less than 3% of Staffordshire’s municipal waste is sent to landfill sites²² and Staffordshire County Council has set a target of Zero Waste to landfill²³.
- E.5.6.2 It is likely that new development would result in an increase in the local population, and consequently an increase in household waste generation.
- E.5.6.3 It should be noted that the appraisal of reasonable alternative sites is limited in its assessment of waste. In the absence of site-specific waste information relating to the amount of waste likely to be associated with new development sites, at this stage of the assessment process the likely waste impacts arising from each reasonable alternative site is uncertain.
- E.5.6.4 Proposals which would help to reduce waste generation, promote efficient use of resources, and encourage recycling and reuse of materials would be likely to result in a positive impact on this SA Objective. Such opportunities will be evaluated through the policy assessments (see strategic and development management policies within **Appendix G** and site-specific policies within **Appendix J**).
- E.5.6.5 The assessment of reasonable alternative sites regarding waste has focused on the proximity of new development to household waste and recycling centres.

²² Staffordshire County Council (no date) Waste explained. Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/Waste-explained.aspx> [Date accessed: 27/04/23]

²³ Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy. Available at: <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/JointMunicipalWasteManagementStrategy.aspx> [Date accessed: 27/04/23]

- E.5.6.6 The National Assessment of Civic Amenity Sites recommendations for minimum levels of Household Waste Recycling Centre provision, as set out in the Household Waste Recycling Centre (HWRC) Guidance²⁴ are: Maximum driving times to a site for the majority of residents of 20 minutes in urban areas, and 30 minutes in rural areas.
- E.5.6.7 A major positive impact would be likely where a proposed development site is within a 10-minute drive from a household waste recycling centre, and a minor positive impact where a site is within a 20-minute drive, or 30-minute drive if situated in a rural area (taken to mean sites located outside of the main towns Newcastle-under-Lyme and Kidsgrove or their immediate vicinity).
- E.5.6.8 Data for household waste recycling centres has been provided by the Council, indicating that there is one centre within the plan area (Leycett Recycling Centre) and three other nearby centres in Stoke-on-Trent (Biddulph, Burslem and Hanford Recycling Centres).
- E.5.6.9 Approximate travel times have been derived through use of Google maps, and with reference to radius maps from TravelTime map demo²⁵.
- E.5.6.10 Effective waste management relies on the availability of a network of appropriate facilities to receive, sort and treat waste. The continued operation, or expansion of such sites can be compromised by encroachment of other forms of development. Where a development proposal coincides with an identified household waste centre there is potential for an adverse impact under the natural resources SA Objective.

Box E.5.1: SA Objective 4: Natural resources strategic assessment methodology

SA4 Receptor	++	+	0	+/-	-	--
Efficient use of land and soil resources	Previously developed land with opportunities for remediating despoiled, degraded, derelict, contaminated or unstable land.	Development proposal located on previously developed land, or land which is of Grade 4 and 5 ALC / classified as 'urban' or 'non-agricultural'.	Development proposals located on previously undeveloped land with no environmental value.	It is uncertain whether a development proposal would lead to the loss of previously undeveloped or high quality agricultural land.	Development proposal located on previously undeveloped land of Grade 1, 2 or 3 ALC comprising less than 20ha.	Development proposal located on previously undeveloped land of Grade 1, 2 or 3 ALC comprising 20ha or more.
Mineral Safeguarding Area	N/A	Site proposal is known and will deliver efficient minerals extraction.	Development proposal does not coincide with an MSA.	N/A	Development proposal coincides with an MSA.	Site is in the immediate vicinity of, or within, an existing / allocated mineral site.

²⁴ WRAP (2018) Household Waste Recycling Centre (HWRC) Guide. Available at:

<https://wrap.org.uk/resources/guide/household-waste-recycling-centre-hwrc-guide> [Date accessed: 07/06/24]

²⁵ TravelTime Map Demo. Available at: <https://app.traveltime.com/reachable/within/10/minutes/public-transport/radius>

SA4 Receptor	++	+	0	+/-	-	--
Household Waste	Nearest Recycling and Household Waste Site within 10 min drive time.	Nearest Recycling and Household Waste Site 10-20 min drive time (10-30 mins in rural areas).	Development proposals for non- residential use would be likely to result in a negligible impact on household waste.	N/A	Nearest Recycling and Household Waste Site more than 20 min drive time (30 mins in rural areas).	Site would directly affect waste management facilities or infrastructur e

E.6 SA Objective 5: Flooding

E.6.1.1 **Box E.6.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Flooding.

E.6.1.2 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

E.6.2 Fluvial flooding

E.6.2.1 The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk information²⁶, and data produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA)²⁷, such that:

- **Flood Zone 3b:** Functional Floodplain – land where water has to flow or be stored in times of flood, or where there is a 3.3% or greater chance of flooding each year;
- **Flood Zone 3a:** 1% or greater chance of flooding each year;
- **Flood Zone 2:** Between 0.1% - 1% chance of flooding each year; and
- **Flood Zone 1:** Less than 0.1% chance of flooding each year.

E.6.2.2 Development proposals where between 1-10% of the site area coincides with Flood Zone 2, 3a or 3b a minor negative impact would be expected. Where 10% or more of the site area coincides with Flood Zone 2, 3a or 3b, a major negative impact would be expected. Where development proposals are located within Flood Zone 1, away from areas of fluvial flood risk, a minor positive impact would be expected.

E.6.2.3 It should be noted that the assessment is limited in terms of considering the impact of climate change on flood risk. At this stage, no data has been made available to inform the assessment of reasonable alternative sites regarding extents of flood risk in the future. It is recommended that the potential impacts of climate change and flood risk on development sites is considered through a Level 2 SFRA.

E.6.2.4 Climate change has the potential to increase all forms of flood risk including fluvial (rivers), surface water, groundwater, sewers and impounded water bodies (reservoirs and canals) which should also be explored.

²⁶ Environment Agency (2022) Flood risk and coastal change. Available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change> [Date accessed: 07/06/24]

²⁷ JBA Consulting (2019) Newcastle-under-Lyme Borough Council Level 1 Strategic Flood Risk Assessment Final Report, October 2019. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/282/level-1-strategic-flood-risk-assessment-report-october-2019> [Date accessed: 07/06/24]

E.6.3 Surface water flooding

E.6.3.1 The level of surface water flood risk (SWFR) present across the Plan area is based on Environment Agency data²⁸, such that:

- **High risk:** more than a 3.3% chance of flooding each year;
- **Medium risk:** between 1% and 3.3%; and
- **Low risk:** between 0.1% and 1% chance.

E.6.3.2 Development proposals where over 50% of the site coincides with areas at low risk, over 10% of the site coincides with medium risk, and/or over 1% of the site coincides with high risk of surface water flooding would be expected to have a major negative impact on surface water flooding.

E.6.3.3 Development proposals where over 1% of the site coincides with areas at low and/or medium risk of surface water flooding would be expected to have a minor negative impact on surface water flooding.

E.6.3.4 Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on surface water flooding for the purposes of this assessment.

E.6.3.5 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

Box E.6.1: SA Objective 5: Flooding strategic assessment methodology

SA5 Receptor	++	+	0	+/-	-	--
Fluvial flood zone	N/A	Development proposals which are located wholly within Flood Zone 1.	N/A	N/A	Development proposals where between 1-10% of the site area coincides with Flood Zones 2, 3a and/or 3b.	Development proposals where 10% or more of the site area coincides with Flood Zones 2, 3a and/or 3b.
Surface water flood risk	Development proposals which demonstrate a reduction in surface water flood risk.	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures.	Development proposals which are not located in areas determined to be at risk of surface water flooding, or are of very low SWFR.	N/A	Development proposals where between 1-50% of the site area coincides with low SWFR and/or between 1-10% medium SWFR.	Development proposals where 50% or more of the site area coincides with areas at low SWFR, 10% medium SWFR, and/or 1% high SWFR.

²⁸ Environment Agency (2013) Risk of flooding from surface water – understanding and using the map. Available at: <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map> [Date accessed: 07/06/24]

E.7 SA Objective 6: Water

E.7.1.1 **Box E.7.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Water.

E.7.1.2 The Local Plan should seek to promote the protection of inland surface waters and groundwater.

E.7.1.3 The Water Framework Directive (WFD) aims to protect and improve the water environment. Under the WFD there is a requirement for all waterbodies to meet 'Good Ecological Status or Potential' by 2027. The Plan must ensure that proposals do not jeopardise the current status of a WFD element or cause deterioration to a receiving waterbody.

E.7.2 Watercourses

E.7.2.1 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water²⁹. A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance^{30,31}. As such, a 10m zone has been applied in this assessment, using watercourse mapping data available from Ordnance Survey³².

E.7.2.2 However, it should be noted that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff.

E.7.3 Groundwater

E.7.3.1 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any site that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality.

E.7.3.2 Groundwater source catchments are divided into three zones:

- **Inner Zone (Zone I)** – 50-day travel time from any point below the water table to the source;
- **Outer Zone (Zone II)** – 400-day travel time; and

²⁹ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality.

³⁰ DAERA (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 07/06/24]

³¹ Wild Trout Trust. Buffer Zones. Available at: <https://www.wildtrout.org/content/buffer-zones> [Date accessed: 07/06/24]

³² Ordnance Survey (2023) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 07/06/24]

- **Total Catchment (Zone III)** – within which all groundwater recharge is presumed to be discharged at the source.

- E.7.3.3 Development proposals located within the total catchment (Zone III) or outer zone (Zone II) of an SPZ would be likely to have a minor negative impact on groundwater quality. Development proposals located within the inner zone (Zone I) of an SPZ would be likely to have a major negative impact on groundwater quality.
- E.7.3.4 SPZ data is available from the Environment Agency³³.
- E.7.3.5 Drinking Water Groundwater Safeguard Zones (SgZs) are established around public water supplies where additional pollution control measures are needed. In Newcastle-under-Lyme, there is only one identified SgZ which coincides with SPZ II to the north of Mucklestone. No reasonable alternative sites coincide with this SgZ and as such the SA assessment has not included reference to this receptor.

E.7.4 Water resources

- E.7.4.1 It is assumed that proposals will at least be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the 2010 Building Regulations 2010³⁴.
- E.7.4.2 It is assumed that all housing proposals in the Local Plan will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.
- E.7.4.3 The Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the Plan area, with reference to the Phase 1 Water Cycle Study (2020)³⁵ and the Phase 2 Water Cycle Study (2024)³⁶
- E.7.4.4 At this stage of the assessment process, there is no information available on a site-by-site basis to inform assessments with regard to the impact of each reasonable alternative site on water resources.

³³ Environment Agency (2024) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 07/06/24]

³⁴ MHCLG (2010) The Building Regulations 2010: Water efficiency of new dwellings. Available at: <https://www.legislation.gov.uk/uksi/2010/2214/regulation/36> [Date accessed: 07/06/24]

³⁵ JBA Consulting (2020) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study: Phase 1. January 2020. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 07/06/24]

³⁶ JBA Consulting (2024) Newcastle-under-Lyme Borough Council Water Cycle Study: Phase 2. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

Box E.7.1: SA Objective 6: Water strategic assessment methodology

SA6 Receptor	++	+	0	+/-	-	--
Water quality	Development proposals which demonstrate that the development improves the Ecological Status of a waterbody under the WFD.	Development proposal includes integration of GI or the naturalisation of watercourses.	N/A	Development proposals located over 10m from a watercourse.	Development proposals located within 10m of a watercourse.	N/A
Groundwater SPZ	N/A	N/A	Development proposal does not coincide with a groundwater SPZ.	N/A	Development proposal coincides with Zone II or III of a groundwater SPZ.	Development proposal coincides with Zone I of a groundwater SPZ.

E.8 SA Objective 7: Cultural Heritage

- E.8.1.1 **Box E.8.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Cultural Heritage.
- E.8.1.2 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.
- E.8.1.3 Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas (CA).
- E.8.1.4 It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the Local Plan). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.
- E.8.1.5 Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.
- E.8.1.6 Where a Grade I, Grade II* or Grade II Listed Building, SM or RPG coincides with a site proposal, it is assumed that the setting of these features will be permanently altered, and a major negative impact would be expected. Where a site lies adjacent to a Grade I Listed Building it is assumed that the proposal would also permanently alter the setting to the asset and a major negative impact on the historic environment would be expected.
- E.8.1.7 Where the site lies adjacent to, or in close proximity to, a Grade II* or Grade II Listed Building, a SM, or an RPG, or where the site lies in close proximity to a Grade I Listed Building, an adverse impact on the setting of the asset would be likely, to some extent, and a minor negative impact would therefore be expected. Potential impacts on Conservation Areas and their setting are recorded as minor negative impacts.
- E.8.1.8 Newcastle-under-Lyme Borough contains several locally important (non-designated) features³⁷. However, spatial data has not been available at this stage to inform the assessments on a site-by-site basis.

³⁷ Newcastle-under-Lyme Borough Council (2023) Register of locally important buildings and structures. Available at: <https://www.newcastle-staffs.gov.uk/conservation-heritage/register-locally-important-buildings-structures> [Date accessed: 27/04/23]

E.8.1.9 It is anticipated that NuLBC will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

E.8.1.10 Data for heritage assets³⁸, including the Heritage at Risk Register³⁹, are available from Historic England.

Box E.8.1: SA Objective 7: Cultural Heritage strategic assessment methodology

SA7 Receptor	++	+	0	+/-	-	--
Grade I Listed Buildings	N/A	Development proposal which could potentially enhance a Grade I Listed Building or its setting.	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.	The effect of the proposed development on a nearby receptor is uncertain.	Development proposal located within the wider setting of a Grade I Listed Building.	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
Grade II* Listed Buildings	N/A	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.	The effect of the proposed development on a nearby receptor is uncertain.	Development proposal located within the setting of a Grade II* Listed Building.	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
Grade II Listed Buildings	N/A	Development proposal which could potentially enhance a Grade II Listed Building or its setting.	Development proposal not considered likely to impact a Grade II Listed Building or its setting.	The effect of the proposed development on a nearby receptor is uncertain.	Development proposal located within the setting of a Grade II Listed Building.	Development proposal coincides with a Grade II Listed Building.
Conservation Areas	N/A	Development proposals which could potentially enhance the character or setting of a Conservation Area.	Development proposal not considered to impact a Conservation Area or its setting.	The effect of the proposed development on a nearby receptor is uncertain.	Development proposal located within a Conservation Area or potentially within the setting of a Conservation Area.	N/A

³⁸ Historic England (2022) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 21/12/22]

³⁹ Historic England (2022) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 21/12/22]

SA7 Receptor	++	+	0	+/-	-	--
Scheduled Monuments	N/A	Development proposal which could potentially enhance an SM or its setting.	Development proposal not considered to impact an SM or its setting.	The effect of the proposed development on a nearby receptor is uncertain.	Development proposal located within the setting of a SM.	Development proposal coincides with a SM.
Registered Parks and Gardens	N/A	Development proposal which could potentially enhance an RPG or its setting.	Development proposal not considered likely to impact an RPG or its setting.	The effect of the proposed development on a nearby receptor is uncertain.	Development proposal located within the setting of an RPG.	Development proposal coincides with an RPG.

E.9 SA Objective 8: Landscape

E.9.1.1 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

E.9.1.2 **Box E.9.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Landscape.

E.9.2 National Park

E.9.2.1 The Peak District National Park lies approximately 9.8km to the north east of the plan area, at its closest point. Given this distance, and at this stage of the assessment process, there is unlikely to be any significant adverse effects on the special qualities of the National Park arising from the proposed development sites. It is assumed that any future development would be accompanied by a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA) to consider any potential for adverse impacts.

E.9.3 Green Belt

E.9.3.1 As part of the evidence to inform the former joint Local Plan with Stoke-on-Trent Council, NuLBC commissioned a Green Belt Assessment to review the potential release of Green Belt sites for development^{40 41}. The purpose of the Green Belt Assessment was to provide the Councils with an objective, evidence-based and independent assessment of how the land parcels contributes to the five purposes of Green Belt set out in the NPPF:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

⁴⁰ Arup (2017) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment: Final Report Issue | 21 November 2017. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 27/04/23]

⁴¹ Arup (2020) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council: Green Belt Assessment Part 2 Study. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 14/06/24]

- E.9.3.2 The Green Belt Assessment classified land parcels as making a 'strong', 'moderate' or 'weak' overall contribution to the five purposes of the Green Belt. Mapped outputs from this evaluation have been used in GIS to inform the assessment of reasonable alternative sites in the SA.
- E.9.3.3 Subsequent updates to the Green Belt Assessment have been prepared including Part 3 of the assessment (2023)⁴² and a further draft update (2024)⁴³ which includes an updated assessment for a number of land parcels. Where applicable to reasonable alternatives assessed in the SA, the latest available information has been used, and declared within the assessment text. In some cases, this supersedes the spatial information which informed the Regulation 18 SA with regard to the overall contribution of sites to the purposes of the Green Belt.
- E.9.3.4 Proposed development sites located in areas classed as 'strong' would be likely to result in a major negative impact on the landscape objective, those within areas classed as 'moderate' a minor negative impact, and those within areas classed as 'weak' a negligible impact. Proposed sites located outside of the Green Belt would be likely to result in a minor positive impact for the purposes of this assessment.
- E.9.3.5 It should be acknowledged that Green Belt designations do not necessarily relate to high quality or sensitive landscapes.

E.9.4 Landscape Character

- E.9.4.1 Baseline data on Landscape Character Type (LCT) within the Plan area are derived from the Landscape and Settlement Character Assessment (LSCA) (2022)⁴⁴. Key characteristics and sensitivities of each LCT as described in the LSCA (Part 2) have informed the appraisal of each site proposal against the landscape objective. Given that the detailed nature of the landscape in relation to each site is unknown, the assessment of impact is based on the overall landscape character guidelines and key characteristics.
- E.9.4.2 Development proposals which are considered to be potentially discordant with the guidelines and characteristics provided in the published LSCA would be expected to have a minor negative impact on the landscape objective.
- E.9.4.3 Development proposals located outside of the LSCA study area, within the urban areas of Newcastle-under-Lyme and Kidsgrove, have been excluded from this assessment.

⁴² Arup (2023) Green Belt Review Part 3. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

⁴³ Arup (2024) Newcastle-under-Lyme Council Green Belt Site Review: Consolidated Report. Draft report provided to Lepus dated 13 May 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 23/07/24]

⁴⁴ Chris Blandford Associates (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/401/landscape-and-settlement-character-assessment-study-2022-part-1> [Date accessed: 02/05/23]

E.9.5 Landscape Sensitivity

- E.9.5.1 Based on the key settlements and development scenarios agreed with the Council, the landscape sensitivity of the settlement fringes has been assessed in the LSCA (2022)⁴⁵ within the context of the appropriate Landscape Character Areas (LCAs).
- E.9.5.2 The LSCA has classed each LCA as either 'High', 'Medium' or 'Low' sensitivity. Proposed development sites within areas of 'High' sensitivity would be expected to result in a major negative impact for the purposes of this assessment, within 'Medium' sensitivity would be expected to result in a minor negative impact, and within 'Low' sensitivity would be expected to result in a minor positive impact.
- E.9.5.3 Information for the sensitivity of each LCA is derived from data provided by the Council and the Settlement Fringe Landscape Sensitivity (Table 4.3) as presented in the LSCA (Part 1).

E.9.6 Views

- E.9.6.1 Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network would be expected to have a minor negative impact on the landscape objective.
- E.9.6.2 In order to consider potential visual effects of development, it has been assumed that the proposals would broadly reflect the character of nearby development of the same type.
- E.9.6.3 Views have been identified through the use of aerial photography and Google Maps⁴⁶. Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development. Data for PRoWs has been provided by the Council.

E.9.7 Urban Sprawl/ Coalescence

- E.9.7.1 Development proposals which are considered to increase the risk of future development spreading further into the wider landscape would be expected to have a minor negative impact on the landscape objective.
- E.9.7.2 Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements would be expected to have a potential minor negative impact on the landscape objective.

E.9.8 TPOs

- E.9.8.1 It is anticipated that development proposals which coincide with trees which are registered under Tree Preservation Orders (TPOs) could have adverse impacts on these trees and their protected status, resulting in a minor negative impact for this objective due to potential impacts on landscape settings. Data for TPOs has been provided by the Council.

Box E.9.1: SA Objective 8: Landscape and Townscape strategic assessment methodology

⁴⁵ Chris Blandford Associates (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/401/landscape-and-settlement-character-assessment-study-2022-part-1> [Date accessed: 02/05/23]

⁴⁶ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

SA8 Receptor	++	+	0	+/-	-	--
Landscape Character Assessment	N/A	Development proposals which would protect or enhance features of the landscape as identified within the LSCA.	Development proposals not located in an area considered as part of the LSCA. Development proposals unlikely to be discordant with the guidelines and characteristics as set out in the LSCA.	N/A	Development proposals which could potentially be discordant with the key characteristics as set out in the LSCA.	N/A
Landscape sensitivity	N/A	Development proposals within areas defined as Low Sensitivity.	Development proposals within areas defined as 'N/A' for sensitivity.	N/A	Development proposals within areas defined as Medium Sensitivity.	Development proposals within areas defined as High Sensitivity.
Green Belt	N/A	Development proposals located outside of the Green Belt.	Weak overall contribution to the Green Belt.	Development proposals located within the Green Belt but outside of the Green Belt Assessment study area.	Moderate overall contribution to the Green Belt.	Strong overall contribution to the Green Belt.
Alter views from the PRow network	N/A	Development proposals which could potentially improve the views experienced from the nearby PRow network.	Development proposals are not considered to significantly alter views experienced by users of the PRow network.	N/A	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRow network.	N/A
Urbanisation on the countryside	N/A	N/A	Development proposals are not considered to significantly increase the risk of future development spreading into the wider landscape.	N/A	Development proposals which are considered to increase the risk of future development spreading into the wider landscape.	N/A

SA8 Receptor	++	+	0	+/-	-	--
Coalescence	N/A	N/A	Development proposals are not considered to significantly reduce the separation between existing settlements and increase the risk of the coalescence of settlements.	N/A	Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements.	N/A
TPOs	N/A	N/A	Development proposals which do not coincide with or are adjacent to TPOs.	N/A	Development proposals which coincide with or are adjacent to TPOs.	N/A

E.10 SA Objective 9: Health and Wellbeing

E.10.1.1 **Box E.10.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.

E.10.1.2 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRow network.

E.10.1.3 The assessments under this objective as set out in **Box E.10.1** apply to sites proposed for residential use / mixed-use including residential only. Sites proposed for employment or non-residential uses would be likely to result in a negligible impact on all receptors within this objective.

E.10.2 Hospitals

E.10.2.1 For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of sites to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. There are no hospitals within the Plan area itself, although Royal Stoke University Hospital which provides an A&E service is located in Stoke-on-Trent, adjacent to the eastern boundary of Newcastle-under-Lyme Borough.

E.10.2.2 In line with Barton *et al.*'s sustainable distances⁴⁷, development proposals located within 5km of one of these hospitals would be expected to have a minor positive impact on site end users' access to emergency health services. Development proposals located over 5km from these hospitals would be likely to have a minor negative impact on site end users' access to emergency health care.

E.10.3 GP surgery

E.10.3.1 There are numerous GP surgeries located across the Plan area, although the majority are clustered towards the north east within the main towns. It is desirable for new residents to be situated within walking distance of a GP surgery.

E.10.3.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁴⁸. As such, proposed development sites for residential use have been assessed based on their distance from GP surgeries, such that, if the majority of a site is:

⁴⁷ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

⁴⁸ Available at: https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2_Guidelines_for_Providing_for_Journeys_on_Foot_IHT.pdf?m=638113839682970000 [Date accessed: 03/05/23]

- Within 200m, a major positive impact on access to GP surgeries would be expected;
- Between 200m and 400m, a minor positive impact on access to GP surgeries would be expected;
- Between 400m and 800m, a negligible/neutral impact on access to GP surgeries would be expected; and
- Beyond 800m, a minor negative impact on access to GP surgeries would be expected.

E.10.4 Leisure facilities

E.10.4.1 Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise.

E.10.4.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁴⁹. As such, proposed development sites for residential use have been assessed based on their distance from leisure facilities, such that if the majority of a site is:

- Within 400m, a major positive impact on access to leisure centres would be expected;
- Between 400m and 800m, a minor positive impact on access to leisure centres would be expected;
- Between 800m and 1.2km, a negligible/neutral impact on access to leisure centres would be expected; and
- Beyond 1.2km, a minor negative impact on access to leisure centres would be expected.

E.10.4.3 Data for leisure and recreation centres has been provided by the Council.

E.10.5 Open / green space

E.10.5.1 Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities.

E.10.5.2 Data for open spaces has been provided by the Council, derived from the Open Space Strategy (2022)⁵⁰. This dataset includes: allotments; amenity greenspace; cemeteries and churchyards; green corridors; natural and semi-natural greenspace; parks and gardens; and provision for children and teenagers.

⁴⁹ Available at: https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2_Guidelines_for_Providing_for_Journeys_on_Foot_IHT.pdf?m=638113839682970000 [Date accessed: 03/05/23]

⁵⁰ RSK (2022) Newcastle-under-Lyme Borough Council Open Space and Green Infrastructure Strategy. Final Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/1440/report> [Date accessed: 03/05/23]

- E.10.5.3 However, not all open spaces within the borough are freely accessible to the public. For the purposes of this assessment, reference has been made to the access of each reasonable alternative site to freely accessible open spaces only, based on the Access to Natural Greenspace Standards (ANGSt) Profiles available from Natural England's online tool⁵¹. The ANGSt Profile shows the full set of ANGSt assessments into one 'combined buffer' map to allow an understanding of the ANGSt Profile for any given location. The ANGSt Profile sets out which Standards are met at any given location, ranging from 1-6.
- E.10.5.4 Development proposals located in an area where four or more buffers are met would be likely to have a major positive impact on access to greenspace, two or three only one buffer is met would be likely to have a minor positive impact, and where only one buffer is met a negligible impact would be expected. Development proposals which do not meet any ANGSt buffers would be likely to have a minor negative impact on access to greenspace for the purpose of this assessment.
- E.10.5.5 Development proposals which coincide with a greenspace could potentially result in a net loss in the provision of open and green space across the borough, leading to a major negative impact on this receptor. Conversely, development proposals which would include provision of new greenspace could lead to a major positive impact.

E.10.6 Green and blue infrastructure

- E.10.6.1 The Local Plan should seek to maintain and enhance the quality, accessibility and connectivity of blue and green infrastructure.
- E.10.6.2 At this stage of the assessment process, information is not available on a site-by-site basis in terms of the implications for connectivity of open space and blue/green infrastructure. At the time of writing, the Nature Recovery Network for Staffordshire is in development⁵². The emerging Nature Recovery Network will seek to "*enable improved connections for wildlife, allowing plants, animals, nutrients and water to move from place to place and will bring wildlife closer to people*", with associated benefits for both wildlife (see Objective 3) and human health.

⁵¹ Natural England (2023) Green Infrastructure Map. Available at:

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx> [Date accessed: 04/05/23]

⁵² Staffordshire Wildlife Trust (2023) Mapping out Staffordshire's Nature Recovery Network. Available at:

https://www.staffs-wildlife.org.uk/news/mapping-out-staffordshires-nature-recovery-network?gclid=EAlaIqObChMI7Oja5-jY_gIVqujtCh3fTQgkEAAYASAAEgJuQ_D_BwE [Date accessed: 03/05/23]

Box E.10.1: SA Objective 9: Health and Wellbeing strategic assessment methodology

SA9 Receptor	++	+	0	+/-	-	--
NHS hospital with A&E	N/A	Development proposals located within 5km of an NHS hospital providing an A&E service.	N/A	N/A	Development proposals located over 5km from an NHS hospital providing an A&E service.	N/A
GP surgery	Walking distance to GP surgery 200m or less.	Walking distance to GP surgery 400m.	Walking distance to GP surgery 800m.	N/A	Over 800m walking distance to GP surgery.	Potential for loss of healthcare facilities.
Leisure facilities	Walking distance to leisure centre 400m or less.	Walking distance to leisure centre 800m.	Walking distance to leisure centre 1.2km.	N/A	Over 1.2km walking distance to leisure centre.	N/A
Access to open / green space	Development proposals within the accessibility catchment for four or more ANGSt. Development proposals would provide new accessible greenspace.	Development proposals within the accessibility catchment for two or three ANGSt.	Development proposals within the accessibility catchment for one ANGSt.	Development proposals which coincide with a greenspace where public access is 'limited' or 'unconfirmed' and so it is uncertain whether it could result in a net loss.	Development proposals located in areas which do not meet any ANGSt.	Development proposals which coincide with a freely accessible greenspace and could result in a net loss.

E.11 SA Objective 10: Equality

E.11.1.1 **Box E.11.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Equality.

E.11.2 Housing provision

E.11.2.1 The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Small and medium sized sites can also make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

E.11.2.2 When striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions and community stability⁵³.

E.11.2.3 Estimated housing capacity for each reasonable alternative site has been provided by NuLBC.

E.11.2.4 Development proposals which would be expected to result in a net loss of housing across the Plan area would be expected to have an adverse impact on NuLBC's ability to meet the required housing demand. Development proposals which would result in a net gain of housing across the Plan area would be expected to have a positive impact on meeting housing demand.

E.11.2.5 Development proposals which would result in no net change in dwellings would be expected to have a negligible impact on the local housing provision.

E.11.2.6 At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

E.11.3 Deprivation and community

E.11.3.1 The Local Plan should seek to create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

E.11.3.2 Development proposals for residential use on land which currently comprises community facilities, employment space or other services could potentially lead to adverse impacts on community cohesion, associated with a loss of community services, with a minor negative impact recorded under this objective.

⁵³ Dempsey. N., Brown. C. and Bramley. G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. *Progress in Planning* 77:89-141

- E.11.3.3 Conversely, development sites which would provide opportunities for delivering new community facilities and services could potentially improve community cohesion and strengthen local identity, and lead to a minor positive impact on this objective.
- E.11.3.4 An assessment of current land use has been made through reference to aerial photography and the use of Google Maps⁵⁴.
- E.11.3.5 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. According to the IMD (2019)⁵⁵, Newcastle-under-Lyme Borough has an average IMD rank of 16,926. Two LSOAs in the borough fall within the 10% most deprived in England. IMD data is available from MHCLG⁵⁶.
- E.11.3.6 For the purpose of this assessment, it is considered that development within areas which are some of the 10% most deprived in England could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services.
- E.11.3.7 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on deprivation and equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

E.11.4 Crime

- E.11.4.1 No spatial data has been available to inform the assessments in terms of crime on a site-by-site basis. Specific details relating to each reasonable alternative site, including layout and operational hours, are not known.
- E.11.4.2 There may be opportunities to incorporate design principles which reduce crime and the fear of crime, such as through ensuring natural surveillance and carefully considering site layout, for example through reference to 'Secured by Design' principles⁵⁷. Such opportunities will be evaluated through the policy assessments (see strategic and development management policies within **Appendix G** and site-specific policies within **Appendix J**).

⁵⁴ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

⁵⁵ Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 07/06/24]

⁵⁶ Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714> [Date accessed: 07/06/24]

⁵⁷ Secured by Design: Homes 2023. Available at: https://www.securedbydesign.com/images/HOMES_GUIDE_2023_web.pdf [Date accessed: 07/06/24]

Box E.11.1: SA Objective 10: Equality strategic assessment methodology

SA10 Receptor	++	+	0	+/-	-	--
Housing provision	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).	Development proposals would not impact housing provision.	It is uncertain whether the proposed development would result in a net change in housing provision.	Development proposals which result in a minor net decrease in housing.	Development proposals which result in a significant net decrease in housing.
Deprivation	Development proposals are known to provide opportunities to provide a safer and more inclusive community that promotes wellbeing.	Development proposals would result in the provision of community services.	Development proposals would be expected to have no significant impact on deprivation.	The effect of a proposed development on deprivation is uncertain.	Development proposals within most deprived 10% LSOAs in England where, without careful planning, development could lead to exacerbation of social issues. Or, development proposals would result in the loss of community services.	Development proposals could lead to further segregation in society e.g. gated community in a deprived area.

E.12 SA Objective 11: Transport and Accessibility

E.12.1.1 **Box E.12.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Transport and Accessibility.

E.12.1.2 The assessments under this objective for access to bus stops, train stations, pedestrian and cycle networks applies to all reasonable alternative sites. The assessments for the other receptors as set out in **Box E.12.1** apply to sites proposed for residential use / mixed-use including residential only (access to primary/secondary schools, employment and local services). Sites proposed for employment or non-residential uses would be likely to result in a negligible impact on these receptors.

E.12.2 Bus stop

E.12.2.1 It is desirable for site end users to be situated within walking distance of a bus stop.

E.12.2.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁵⁸. As such, proposed development sites have been assessed based on their distance from bus stops, such that if the majority of a site is:

- Within 200m, a major positive impact on access to bus stops would be expected;
- Between 200m and 400m, a minor positive impact on access to bus stops would be expected;
- Between 400m and 800m, a negligible/neutral impact on access to bus stops would be expected; and
- Beyond 800m, a minor negative impact on access to bus stops would be expected.

E.12.2.3 Bus stop data has been provided by the Council.

E.12.3 Train station

E.12.3.1 There is one train station located within the borough, Kidsgrove Station in the north. Several other stations are located close to the borough boundary including Stoke-on-Trent Station, Longport Station and Alsager Station.

⁵⁸ Available at: [https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2 Guidelines for Providing for Journeys on Foot IHT.pdf?m=638113839682970000](https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2%20Guidelines%20for%20Providing%20for%20Journeys%20on%20Foot%20IHT.pdf?m=638113839682970000) [Date accessed: 07/06/24]

E.12.3.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁵⁹. As such, proposed development sites have been assessed based on their distance from key employment locations, such that if the majority of a site is:

- Within 400m, a major positive impact on access to employment opportunities would be expected;
- Between 400m and 800m, a minor positive impact on access to employment opportunities would be expected;
- Between 800m and 1.2km, a negligible/neutral impact on access to employment opportunities would be expected; and
- Beyond 1.2km, a minor negative impact on access to employment opportunities would be expected.

E.12.3.3 Train station data has been provided by the Council.

E.12.4 Pedestrian access

E.12.4.1 New development sites have been assessed in terms of their access to the surrounding footpath network. In order for a positive impact to be anticipated with regard to pedestrian access, consideration has been given to safe access to and from the site e.g., footpath or Public Right of Way (PRoW). Safe access is determined to be that which is suitable for wheelchair users and pushchairs.

E.12.4.2 Development proposals which would be expected to provide site end users with adequate access to the surrounding footpath network would be expected to have a minor positive impact on pedestrian access. Development proposals which would not be anticipated to provide adequate access would be expected to result in a minor negative impact on pedestrian access.

E.12.4.3 Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps⁶⁰. Data for PRoWs has been provided by the Council.

E.12.5 Cycle access

E.12.5.1 New development sites have been assessed in terms of their access to the local cycle network. Development proposals which would be expected to provide site end users with adequate access to the surrounding cycle network, i.e., where a cycle route is located adjacent to the site, would be expected to have a minor positive impact on cycle access. Development proposals which would not be anticipated to provide adequate access would be expected to result in a minor negative impact on cycle access.

⁵⁹ Available at: https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2_Guidelines_for_Providing_for_Journeys_on_Foot_IHT.pdf?m=638113839682970000 [Date accessed: 07/06/24]

⁶⁰ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

E.12.5.2 Data for local cycle routes has been provided by the Council and considered alongside national cycle route data available from Sustrans⁶¹.

E.12.6 Access to schools

E.12.6.1 It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills, and qualifications of residents.

E.12.6.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁶². As such, proposed development sites for residential use have been assessed based on their distance from primary schools, such that if the majority of a site is:

- Within 200m, a major positive impact on access to primary schools would be expected;
- Between 200m and 400m, a minor positive impact on access to primary schools would be expected;
- Between 400m and 800m, a negligible/neutral impact on access to primary schools would be expected; and
- Beyond 800m, a minor negative impact on access to primary schools would be expected.

E.12.6.3 Proposed development sites for residential use have been assessed based on their distance from secondary schools, such that if the majority of a site is:

- Within 400m, a major positive impact on access to secondary schools would be expected;
- Between 400m and 800m, a minor positive impact on access to secondary schools would be expected;
- Between 800m and 1.2km, a negligible/neutral impact on access to secondary schools would be expected; and
- Beyond 1.2km, a minor negative impact on access to secondary schools would be expected.

E.12.6.4 Data for schools has been provided by the Council.

⁶¹ Sustrans Open Data Portal. Available at: <https://data-sustrans-uk.opendata.arcgis.com/>

⁶² Available at: https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2_Guidelines_for_Providing_for_Journeys_on_Foot_IHT.pdf?m=638113839682970000 [Date accessed: 07/06/24]

E.12.7 Access to employment opportunities

E.12.7.1 Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors. For the purposes of this assessment, key employment areas where a range of job opportunities would be expected includes business parks, industrial estates and strategic/town/district centres. Data for these services has been provided by the Council.

E.12.7.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁶³. As such, proposed development sites for residential use have been assessed based on their distance from key employment locations, such that if the majority of a site is:

- Within 400m, a major positive impact on access to employment opportunities would be expected;
- Between 400m and 800m, a minor positive impact on access to employment opportunities would be expected;
- Between 800m and 1.2km, a negligible/neutral impact on access to employment opportunities would be expected; and
- Beyond 1.2km, a minor negative impact on access to employment opportunities would be expected.

E.12.8 Access to local services

E.12.8.1 It is desirable for new residents to be situated within walking distance of local services. For the purposes of this assessment, 'local services' includes convenience stores, community centres, post offices and libraries. Data for these services has been provided by the Council.

E.12.8.2 The Institute of Highways and Transportation's 'Providing for Journeys on Foot' document contains at table 3.2, suggested acceptable walking distances, for pedestrians without mobility impairment for some common facilities⁶⁴. As such, proposed development sites for residential use have been assessed based on their distance from local services, such that if the majority of a site is:

- Within 200m, a major positive impact on access to local services would be expected;
- Between 200m and 400m, a minor positive impact on access to local services would be expected;
- Between 400m and 800m, a negligible/neutral impact on access to local services would be expected; and

⁶³ Available at: [https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2 Guidelines for Providing for Journeys on Foot IHT.pdf?m=638113839682970000](https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2%20Guidelines%20for%20Providing%20for%20Journeys%20on%20Foot%20IHT.pdf?m=638113839682970000) [Date accessed: 07/06/24]

⁶⁴ Available at: [https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2 Guidelines for Providing for Journeys on Foot IHT.pdf?m=638113839682970000](https://chorley.gov.uk/media/2494/8-2-Guidelines-for-Providing-for-Journeys-on-Foot-IHT/pdf/8.2%20Guidelines%20for%20Providing%20for%20Journeys%20on%20Foot%20IHT.pdf?m=638113839682970000) [Date accessed: 07/06/24]

- Beyond 800m, a minor negative impact on access to local services would be expected.

Box E.12.1: SA Objective 11: Transport and Accessibility strategic assessment methodology

SA11 Receptor	++	+	0	+/-	-	--
Bus stop	Walking distance to bus stop 200m or less.	Walking distance to bus stop 400m.	Walking distance to bus stop 800m.	N/A	Over 800m walking distance to bus stop.	N/A
Train station	Walking distance to train station 400m or less.	Walking distance to train station 800m.	Walking distance to train station 1.2km.	N/A	Over 1.2km walking distance to train station.	N/A
Pedestrian access	N/A	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.	N/A	N/A	Development proposals located in areas which currently have poor access to the surrounding footpath network.	N/A
Cycle access	N/A	Development proposals which are well connected to the existing cycle network.	N/A	N/A	Development proposals located in areas which currently have poor access to the surrounding footpath network.	N/A
Access to primary school	Walking distance to primary school 200m or less, or if a new school is proposed.	Walking distance to primary school 400m.	Walking distance to primary school 800m.	N/A	Over 800m walking distance to primary school.	N/A
Access to secondary school	Walking distance to secondary school 400m or less, or if a new school is proposed.	Walking distance to secondary school 800m.	Walking distance to secondary school 1.2km.	N/A	Over 1.2km walking distance to secondary school.	N/A
Access to employment opportunities	Walking distance to key employment location 400m or less.	Walking distance to key employment location 800m.	Walking distance to key employment location 1.2km.	N/A	Over 1.2km walking distance to key employment location.	N/A

SA11 Receptor	++	+	0	+/-	-	--
Access to local services	Walking distance to local services 200m or less, or if new local services are proposed..	Walking distance to local services 400m.	Walking distance to local services 800m.	N/A	Over 800m walking distance to local services.	N/A

E.13 SA Objective 12: Economy

- E.13.1.1 Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. 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.
- E.13.1.2 **Box E.13.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Economy.
- E.13.1.3 Development proposals which would result in a significant net increase in employment floorspace would be expected to have a major positive impact on the local economy. For the purpose of this assessment, a threshold of 10ha of employment floorspace has been taken as 'significant'. Development proposals which would result in a net increase of up to 10ha of employment floorspace would be expected to have a minor positive impact on the local economy. Development proposals which would result in a significant net decrease in employment floorspace (10ha or more) would be expected to have a major negative impact on the local economy, and those which would result in a minor net decrease in employment floorspace (less than 10ha) would be expected to have a minor negative impact on the local economy.
- E.13.1.4 Development proposals for employment floorspace that currently comprise employment floorspace would be likely to have an overall negligible impact on the economy objective. Assessment of current land use has been made through reference to aerial photography and the use of Google Maps⁶⁵.

Box E.13.1: SA Objective 12: Economy strategic assessment methodology

SA12 Receptor	++	+	0	+/-	-	--
Employment Floorspace	Development proposals which result in a significant net increase in employment floorspace.	Development proposals which result in a minor net increase in employment floorspace.	Development proposals would not impact employment floorspace.	It is uncertain whether the proposed development would result in a net change in employment floorspace.	Development proposals which result in a minor net decrease in employment floorspace.	Development proposals which result in a significant net decrease in employment floorspace.

⁶⁵ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

Appendix F: Pre-Mitigation Assessment of New / Amended Reasonable Alternative Sites at the Regulation 19 Stage

(Refer to **Appendix H** for all reasonable alternative sites considered throughout the SA process)

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F.1 Introduction

F.1.1 Overview

- F.1.1.1 At the previous stage of plan making, a total of 141 reasonable alternative sites were identified by the Council within Newcastle-under-Lyme Borough and evaluated within the Regulation 18 Sustainability Appraisal (SA) (2023)¹.
- F.1.1.2 Following the Regulation 18 'First Draft Plan' consultation in 2023, a further 27 reasonable alternative sites have been identified by the Council, including:
- 22 sites to be considered for residential use;
 - One site to be considered for employment use; and
 - Four sites to be considered for Gypsy and Traveller use.
- F.1.1.3 In addition to the 27 sites identified at the Regulation 19 stage, the Council have provided updated information for six sites which were originally assessed at the Regulation 18 stage, including seven residential sites, one employment site and one mixed-use site. One of these amended sites (SP11) has now been split into four separate sites (SP11(1), SP11(2), SP11(3) and SP11(4)). Therefore, this document includes a total of nine amended site assessments.
- F.1.1.4 The location of the new and amended reasonable alternative sites is shown on **Figure F.1.1**.
- F.1.1.5 These 27 additional and nine amended reasonable alternative sites have been evaluated within this document as part of the Regulation 19 SA, based on the same methodology as those assessed at the Regulation 18 stage. Including the 27 new sites, a total of 177 reasonable alternative sites have therefore been identified, described and evaluated in the SA process to date.
- F.1.1.6 Each of the sites appraised within this report have been assessed for likely impacts on each of the 12 SA Objectives, as outlined in the SA Framework (see **Appendix A**).
- F.1.1.7 All reasonable alternative sites have been considered in the SA process in the same way using the SA Framework, irrespective of their size or location. The assessment has been carried out using red line boundary and site proposal information provided by the Council, as set out in **Table F.1.1**.
- F.1.1.8 Likely sustainability impacts have been set out in **Tables F.2.1 – F.13.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 4** of the main SA Report and the topic-specific methodology as set out in **Appendix E**.

¹ Lepus Consulting (2023) Regulation 18 Sustainability Appraisal of the Newcastle-under-Lyme Local Plan including Strategic Environmental Assessment and Equality Impact Assessment, Volumes 1-3, May 2023. Available at: <https://consult.newcastle-staffs.gov.uk/kse/event/37504> [Date accessed: 01/07/24]

- F.1.1.9 The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation. The potential mitigating influence of the draft Local Plan policies is considered within **Appendix H**.
- F.1.1.10 For the purpose of this assessment, the sites have been grouped into 'clusters' based on the wards they are located within. The sites have all been assessed individually, but from an SA perspective, sites within a cluster are expected to have similar impacts in terms of access to services and facilities and proximity to local environmental assets. As such, the assessment narrative has discussed sites in the context of their clusters where appropriate. Sites within each cluster are shown on **Table F.1.1**.
- F.1.1.11 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Council, as well as expert judgement.

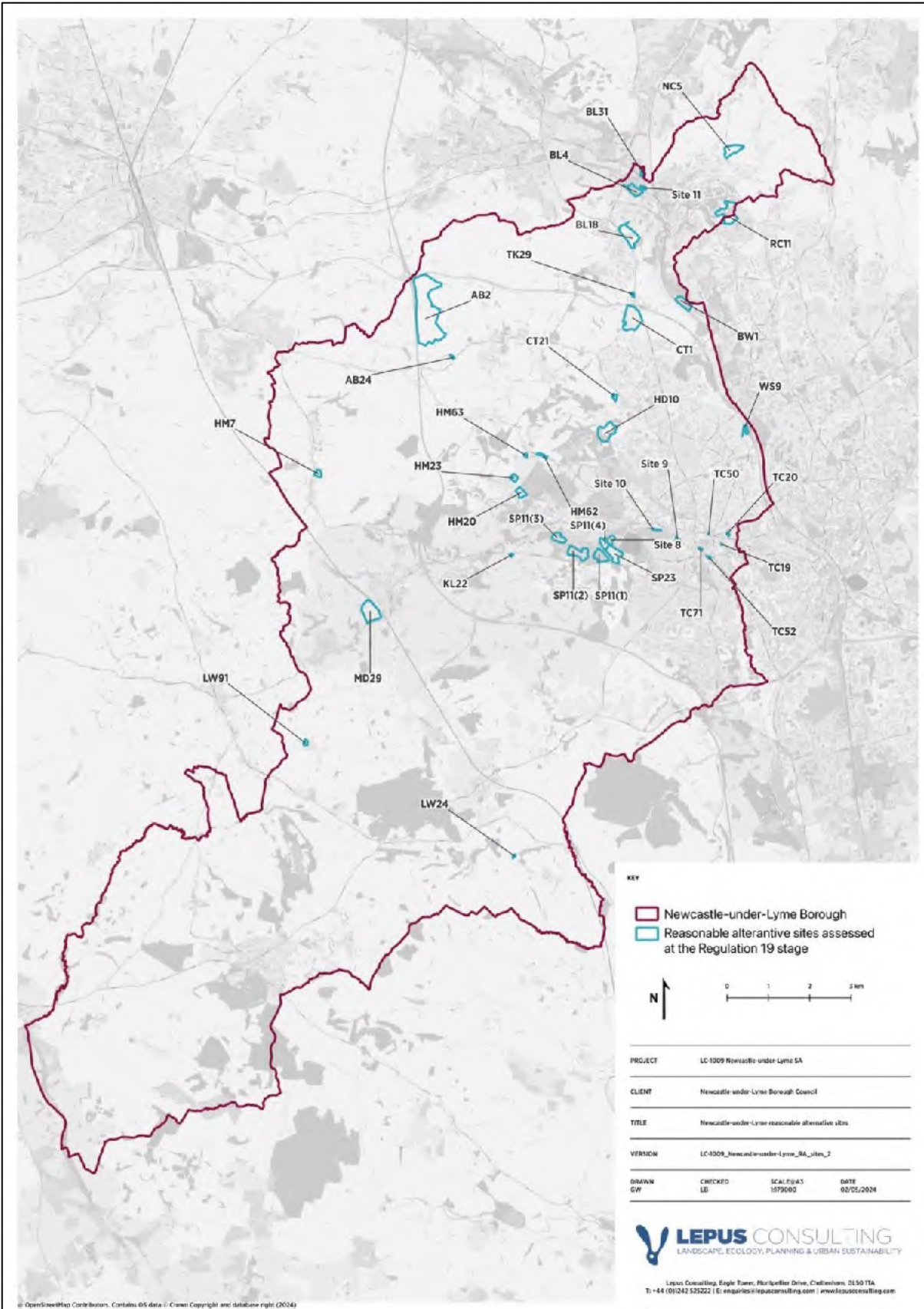


Figure F.1.1: Reasonable alternative sites identified at the Regulation 19 stage within Newcastle-under-Lyme

Table F.1.1: Reasonable alternative sites in Newcastle-under-Lyme Borough (new sites at this stage highlighted blue and amended sites highlighted in orange)²

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
AB2	69.91	Audley	Land adjoining corner of A500 and M6 southbound	Employment	N/A	54.38
AB2 (R19)	78.37	Audley	Land adjoining corner of A500 and M6 southbound	Employment	N/A	22.00
AB4	5.06	Audley	Land off Alsager Road, North of Audley	Mixed use	122	4.05
AB12	6.35	Audley	Land East of Diglake Street, Bignall End	Housing	152	N/A
AB15	1.55	Audley	Land North of Vernon Avenue, Audley	Housing	40	N/A
AB16	28.44	Audley	Land off Boyles Hall Road, Bignall End	Housing	683	N/A
AB22	15.19	Audley	Wall Farm, Audley	Housing	365	N/A
AB24	0.42	Audley	Land at Barthomley Road, Audley	Housing	5-6	N/A
AB27	0.29	Audley	Land South of Apedale Road, Wood Lane	Housing	8	N/A
AB30	17.96	Audley	Land between Bignall End and Boon Hill, Audley	Mixed use (housing, education and sports)	432	14.4
AB32	0.98	Audley	Land Nursery Gardens, Audley	Housing	25	N/A
AB33	2.74	Audley	Land off Nantwich Road / Park Lane (1) Audley	Housing	66	N/A
AB34	11.13	Audley	Land off Nantwich Road / Park Lane (2) Audley	Housing	265	N/A
AB37	13.04	Audley	Land East of Alsager Road (1), Audley	Housing	243	N/A
AB72	4.12	Audley	Land East of Wereton Road, Audley	Housing	99	N/A

² Please note that details for the following sites assessed at the Regulation 18 stage have since been amended, but these amendments will not affect any of the assessment findings as stated in the Regulation 18 SA:

- AB15 has decreased from 40 dwellings to 33 dwellings
- BL32 has decreased from 29 dwellings to 20 dwellings
- KL13 has decreased from 224 dwellings to 220 dwellings, and from an employment area of 11ha to 6ha
- KG6 has decreased from 10 dwellings to 6 dwellings
- LW53 has decreased from 134 dwellings to 130 dwellings

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
AB73	0.50	Audley	Land West of Wereton Road, Audley	Housing	13	N/A
AB75	5.66	Audley	Land west of Bignall End Road	Mixed use	136	4.52
AB77	27.03	Audley	Corner House Farm, Alsager Road, Audley	Mixed use	631	21.04
AB78	3.52	Audley	Land North of Cross Lane, Audley	Housing	85	N/A
AB79	18.66	Audley	Land South of Cross Lane, Audley	Housing	448	N/A
HD26	1.79	Audley	Land South of Shralebrook Road, Halmerend	Housing	45	N/A
HM8	5.25	Audley	Land West of Heathcote Road, Miles Green	Housing	126	N/A
HM10	2.15	Audley	Land off Victoria Avenue, Miles Green	Housing	52	N/A
HM15	0.26	Audley	Land south of Leycett Road, Scot Hay	Housing	8	N/A
HM20	3.65	Audley	Land off Crackley Lane, Audley	Housing	88	N/A
HM22	1.66	Audley	Land adj Holly House, Crackley Lane, Scot Hay	Housing	42	N/A
HM23	2.0	Audley	Land off Leycett Road, Audley	Housing	49	N/A
HM62	1.03	Audley	Land south of Blackbank Road, Alsagers Bank	Housing	26	N/A
HM63	0.53	Audley	Land off Scot Hay Road, Audley	Housing	13	N/A
HM66	2.25	Audley	Land South of Hougher Wall Road, Audley	Housing	54	N/A
CL6	0.48	Clayton, Westbury Park & Northwood	Stafford Crescent (garage site)	Housing	14	N/A
CL8	2.06	Clayton, Westbury Park & Northwood	Land East of Cambridge Drive (2), Clayton	Housing	66	N/A
SB12	1.79	Clayton, Westbury Park & Northwood	Land adjacent to Clayton Lodge Hotel	Housing	61	N/A
CT1	32.04	Crackley Bank, Red Street, Holditch & Chesterton	Land at Red Street and High Carr Farm, Chesterton	Housing	778	N/A
CT1 (R19)	19.42	Crackley Bank, Red Street,	Land at Red Street and High Carr Farm, Chesterton	Housing	530	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
		Holditch & Chesterton				
CT10	4.16	Crackley Bank, Red Street, Holditch & Chesterton	Parkhouse Road West, Chesterton	Employment or Housing	100	2.00
CT20	8.88	Crackley Bank, Red Street, Holditch & Chesterton	Rowhurst Close, Chesterton	Employment	N/A	7.51
CT21	1.43	Crackley Bank, Red Street, Holditch & Chesterton	Land off Watermills Road, Chesterton	Housing	67	N/A
CT25	8.27	Crackley Bank, Red Street, Holditch & Chesterton	Land off Audley Rd, Chesterton	Housing	331	N/A
HD10	13.12	Crackley Bank, Red Street, Holditch & Chesterton	Land South of Apedale Road, Holditch	Employment	N/A	3.57
CH3	3.80	Cross Heath, Knutton and Wolstanton	Land at Hoon Avenue, Newcastle	Housing	106	N/A
CH13	0.59	Cross Heath, Knutton and Wolstanton	Castletown Grange, Douglas Road, Cross Heath	Housing	-7	N/A
CH14	0.69	Cross Heath, Knutton and Wolstanton	Maryhill Day Centre, Wilmott Drive, Cross Heath	Housing	30	N/A
KS3	3.76	Cross Heath, Knutton and Wolstanton	Land at Blackbank Road, Knutton (adjacent Knutton Children's Centre)	Housing	150	N/A
KS11	0.57	Cross Heath, Knutton and Wolstanton	Knutton Community Centre, High Street Knutton	Housing	9	N/A
KS17	2.33	Cross Heath, Knutton and Wolstanton	Knutton Recreation Centre, Knutton Lane	Housing	59	N/A
KS18	0.12	Cross Heath, Knutton and Wolstanton	Land North of Lower Milehouse Lane, Knutton	Housing	10	N/A
KS19	0.08	Cross Heath, Knutton and Wolstanton	Knutton Lane	Housing	5	N/A
WS9	1.45	Cross Heath, Knutton and Wolstanton	Land off Canary Grove / Lamp House Way, Wolstanton	Housing	64	N/A
KL9	6.87	Keele	Land west of Quarry Bank Road, Keele	Housing	110	N/A
KL12	1.32	Keele	Land north of Keele University, Keele	Housing	56	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
KL13	26.13	Keele	Keele Science Park Phase 3, University of Keele	Mixed use	220	6.00
KL14	26.25	Keele	Land South-East of Keele University	Mixed use	56	2.80
KL15	18.05	Keele	Land South of A525 between Keele University and Newcastle	Mixed use	260	13.00
KL20	4.12	Keele	Land South of Pepper Street, Keele	Housing	33	N/A
KL21	23.86	Keele	Land South of A525 and either side of Quarry Bank Rd, Keele	Mixed use	382	19.10
KL22	0.41	Keele	Land off Chapel Close, Keele	Housing	7	N/A
KL33	3.38	Keele	Land West of Keele Road, Keele Road	Housing	54	N/A
KL34	12.32	Keele	Land West of Three Mile Lane, Keele	Housing	197	N/A
BL31	1.15	Kidsgrove & Ravenscliffe	Woodlands Farm, Church Lawton	Housing	Estimated 10-15	N/A
KG6	0.18	Kidsgrove & Ravenscliffe	William Road, Kidsgrove (site of the Galley PH)	Housing	6	N/A
KG26	0.13	Kidsgrove & Ravenscliffe	Land at Bedford Road	Housing	5	N/A
RC4	0.65	Kidsgrove & Ravenscliffe	Kinnersley Street, Kidsgrove	Housing	4	N/A
RC8	0.38	Kidsgrove & Ravenscliffe	Land at Liverpool Road (part of Birchenwood) Kidsgrove (parcel 2)	Housing	14	N/A
RC11	15.41	Kidsgrove & Ravenscliffe	Land at the end of Birchenwood Way, Kidsgrove	Housing	386	N/A
LW14	0.44	Loggerheads	Land off Newcastle Road (Rowney Farm)	Housing	8	N/A
LW23	1.10	Loggerheads	Land at Pinewood Road, Loggerheads	Housing	19	N/A
LW27	3.11	Loggerheads	Land at Church Road, Ashley (2)	Housing	50	N/A
LW29	2.21	Loggerheads	Site 1 Charnes Road, Ashley	Housing	35	N/A
LW30	0.59	Loggerheads	Land at Charnes Road, Ashley	Housing	10	N/A
LW41	1.44	Loggerheads	Land South of Green Lane, Ashley	Housing	25	N/A
LW49	0.28	Loggerheads	Land South of Wrekin House, Muckleston Wood Lane, Loggerheads	Housing	5	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
LW53	8.35	Loggerheads	Land corner of Mucklstone Wood Lane & Rock Lane, Loggerheads	Housing	130	N/A
LW54	9.16	Loggerheads	Land South of Mucklstone Road, Loggerheads	Housing	147	N/A
LW81	2.29	Loggerheads	Gravel Bank, Mucklstone Road, Loggerheads	Housing	37	N/A
LW82	0.98	Loggerheads	Sewage Works, Market Drayton Road, Loggerehads	Housing	7	N/A
LW87	0.19	Loggerheads	Former Petrol Station, Eccleshall Road, Loggerheads	Housing	4	N/A
HM4	1.13	Madeley & Betley	Land corner of Main Road and Checkley Lane, Wrinehill	Housing	29	N/A
HM7	2.12	Madeley & Betley	Land off Crackow Moss Main Road, Betley	Housing	51	N/A
HM28	0.23	Madeley & Betley	Land off East Lawns, Betley	Housing	6	N/A
HM29	0.32	Madeley & Betley	Lord Nelson Farm, Wrinehill	Housing	9	N/A
MD2	1.36	Madeley & Betley	Land at Elmside Garden Centre, Main Road	Housing	35	N/A
MD5	0.85	Madeley & Betley	The Old Wharf, Madeley Heath	Housing	13	N/A
MD11	2.94	Madeley & Betley	Land Area 6 at Marley Eternit Tiles, Madeley Heath	Mixed use	70	2.34
MD12	16.83	Madeley & Betley	Land Area 2 at Marley Eternit Tiles, Madeley Heath	Mixed use	332	11.06
MD13	10.32	Madeley & Betley	Land at Windy Arbour Farm, Madeley	Housing	248	N/A
MD18	4.32	Madeley & Betley	Land West of Furnace Lane, Madeley	Housing	87	N/A
MD19	1.55	Madeley & Betley	Land East of Furnace Lane, Madeley	Housing	40	N/A
MD20	39.13	Madeley & Betley	Brook House Farm, Madeley	Mixed use (housing, education and sports)	350	N/A
MD25	0.74	Madeley & Betley	Land South of Bar Hill, Madeley	Housing	19	N/A
MD29	15.70	Madeley & Betley	Land North of Bar Hill, Madeley	Housing	377	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
MD29 (R19)	15.70	Madeley & Betley	Land North of Bar Hill, Madeley	Housing	150	N/A
MD30	0.74	Madeley & Betley	Land West of Bar Hill, Madeley	Housing	19	N/A
MD32	1.64	Madeley & Betley	Land Adjacent to Rowley House, Moss Lane	Housing	42	N/A
MD33	1.87	Madeley & Betley	Land West of Manor Road, Madeley	Housing	48	N/A
MD34	9.28	Madeley & Betley	Land East of Bowsey Wood Road, Madeley	Housing	223	N/A
MD39	1.30	Madeley & Betley	Land at Red Lane, Wayside, Madeley	Housing	33	N/A
MD40	0.24	Madeley & Betley	Land adjacent to Fern Dene, Madeley	Housing	5	N/A
MD56	14.84	Madeley & Betley	Land off Heighly Castle Way, Madeley	Housing	379	N/A
LW6	3.15	Maer & Whitmore	Land adjacent Moss Farm, Baldwins Gate	Mixed use	54	3.15
LW7	16.72	Maer & Whitmore	Land off Whitmore Road	Housing	178	N/A
LW9	0.60	Maer & Whitmore	Land Adjacent to Slaters Stone Road Hill Chorlton	Housing	10	N/A
LW24	0.39	Maer & Whitmore	Land off Coombesdale Hill, Chorlton	Housing	7	N/A
LW38	2.72	Maer & Whitmore	Land corner of A53 and Sandy Lane, Baldwin's Gate	Housing	41	N/A
LW42	0.93	Maer & Whitmore	Land West of Manor Road, west of Baldwin's Gate	Housing	16	N/A
LW48	3.31	Maer & Whitmore	Land at Chorlton Moss, Baldwin's Gate	Housing	40	N/A
LW74	12.82	Maer & Whitmore	Land at Baldwin's Gate Farm, Site B	Housing	205	N/A
LW78	0.99	Maer & Whitmore	The Elms, Sandy Lane, Baldwins Gate	Housing	17	N/A
LW83	0.66	Maer & Whitmore	Land adjacent Acreswood, Baldwins Gate	Housing	11	N/A
LW84	2.33	Maer & Whitmore	Land North of Stone Road, Baldwins Gate	Housing	37	N/A
LW86	2.11	Maer & Whitmore	Land to the rear of Slaters Village, Baldwins Gate	Mixed use	36	1.79
LW91	1.04	Maer & Whitmore	Land north of Aston Lane, Aston	Housing	17	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
NC5	8.12	Newchapel & Mow Cop	Land south of Harriseahead Lane, Harriseahead	Housing	267	N/A
NC13	3.20	Newchapel & Mow Cop	Land West of Bullockhouse Road, Harriseahead	Housing	103	N/A
NC77	3.06	Newchapel & Mow Cop	Bent Farm, Newchapel	Mixed use	98	2.45
NC78	5.03	Newchapel & Mow Cop	Land south of Pennyfield Road, Newchapel	Housing	39	N/A
NC80	8.78	Newchapel & Mow Cop	Land south of Mow Cop Road, Mow Cop	Housing	281	N/A
NC81	6.16	Newchapel & Mow Cop	Mellors Bank, Mow Cop Road, Mow Cop	Housing	197	N/A
NC83	0.28	Newchapel & Mow Cop	Blue Pot Farm, Alderhay Lane, Rookery	Housing	6	N/A
SP2	0.26	Silverdale	Cheddar Drive, Silverdale	Housing	12	N/A
SP11	75.74	Silverdale	Former Keele Municipal Golf Course	Housing	1,100	N/A
SP11(1) (R19)	7.22	Silverdale	Former Keele Municipal Golf Course	Mixed-use (housing, school and local centre)	255	Unknown
SP11(2) (R19)	9.83	Silverdale	Former Keele Municipal Golf Course	Housing	310	Unknown
SP11(3) (R19)	5.08	Silverdale	Former Keele Municipal Golf Course	Housing	235	Unknown
SP11(4) (R19)	3.40	Silverdale	Former Keele Municipal Golf Course	Housing	100	Unknown
SP12	2.01	Silverdale	Site off Glenwood Close, Silverdale	Housing	73	N/A
SP14	10.68	Silverdale	Site at Gallowtree Roundabout, Silverdale	Housing	352	N/A
SP22	0.70	Silverdale	Former playground off Ash Grove, Silverdale	Housing	36	N/A
SP23	5.20	Silverdale	Land at Cemetery Road / Park Lane	Housing	208	N/A
SP23 (R19)	9.21	Silverdale	Land at Cemetery Road / Park Lane	Housing	200	N/A
BW1	6.50	Talke & Butt Lane and Bradwell	Chatterley Valley, Lowlands Road, Bradwell	Employment	N/A	6.40
BL3	9.28	Talke & Butt Lane and Bradwell	Land at Slacken Lane, Talke (1)	Housing	107	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
BL4	5.91	Talke & Butt Lane and Bradwell	Land at Slaken Lane	Housing	189	N/A
BL8	1.42	Talke & Butt Lane and Bradwell	Land adjacent to roundabout at West Avenue, Kids Grove	Mixed use	48	1.21
BL18	13.45	Talke & Butt Lane and Bradwell	Clough Hall Playing Fields, Talke	Housing	285	N/A
BL18 (R19)	13.45	Talke & Butt Lane and Bradwell	Clough Hall Playing Fields, Talke	Housing	150	N/A
BL24	0.27	Talke & Butt Lane and Bradwell	Land adjacent 31 Banbury Street, Talke	Housing	10	N/A
BL32	0.85	Talke & Butt Lane and Bradwell	Land at Congleton Road, Butt Lane	Mixed use	20	0.72
TK6	0.46	Talke & Butt Lane and Bradwell	Site at Coalpit Hill, Talke	Housing	15	N/A
TK10	5.33	Talke & Butt Lane and Bradwell	Land at Crown Bank, Talke	Housing	170	N/A
TK17	1.24	Talke & Butt Lane and Bradwell	Land off St Martins Road, Talke	Housing	42	N/A
TK18	32.51	Talke & Butt Lane and Bradwell	Jamage South, Land North of A500	Mixed use	1040	26.01
TK24	1.38	Talke & Butt Lane and Bradwell	Land off Coppice Road, Talke (1)	Housing	47	N/A
TK25	22.79	Talke & Butt Lane and Bradwell	Land South of Audley Road and West of Pit Lane	Mixed use	729	18.23
TK27	2.82	Talke & Butt Lane and Bradwell	Land off Coppice Road, Talke (2)	Housing	90	N/A
TK29	0.65	Talke & Butt Lane and Bradwell	Land at the end of Oak Tree Lane, Talke	Housing	44	N/A
TK30	66.37	Talke & Butt Lane and Bradwell	Land off Talke Road and A500, Talke	Mixed use	394	51.98
TK45	6.65	Talke & Butt Lane and Bradwell	Land North of Peacock Hay Road, Chatterley Valley	Employment	N/A	4.12
TK46	8.26	Talke & Butt Lane and Bradwell	Jamage North Reclamation Site, Talke	Housing	187	N/A
TK47	21.14	Talke & Butt Lane and Bradwell	Land North of Peacock Hay Road, Chatterley Valley	Employment	N/A	15.67

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
TB6	0.34	Thistleberry	Former Pool Dam Pub Site, Orme Road, Poolfields, Newcastle	Housing	13	N/A
TB19	45.44	Thistleberry	Land south of Newcastle Golf Club, Whitmore Road	Mixed use	550	36.35
TB23	4.37	Thistleberry	Land West of Galingale View, Thistleberry	Housing	124	N/A
TB24	2.16	Thistleberry	Land north of Butt's Walk, Gallowtree Roundabout	Housing	69	N/A
MB12	0.12	Town Centre and May Bank	Stoneyfields Court, May Bank	Housing	12	N/A
MB13	0.23	Town Centre and May Bank	Hyacinth Court, May Bank	Housing	8	N/A
MB15	0.11	Town Centre and May Bank	The Hollies, May Bank	Housing	12	N/A
TC7	1.92	Town Centre and May Bank	Land bound by Ryecroft, Ryebank, Merrial Street, Corporation Street and Liverpool Road, Newcastle	Mixed use	75	1.63
TC19	0.10	Town Centre and May Bank	Hassell Street Car Park	Housing	5	N/A
TC20	0.34	Town Centre and May Bank	King Street Car Park	Housing	10	N/A
TC22	0.35	Town Centre and May Bank	Marsh Parade, Newcastle (former Zanzibar night club)	Mixed use	70	0.33
TC40	0.20	Town Centre and May Bank	Car Park, Blackfriars Road, Newcastle	Housing	10	0.19
TC45	0.30	Town Centre and May Bank	York Place, Newcastle Town Centre	Employment	N/A	0.29
TC50	0.07	Town Centre and May Bank	Cherry Orchard Car Park	Housing	5	N/A
TC52	0.35	Town Centre and May Bank	Goose Street Car Park	Housing	25	N/A
TC71	0.33	Town Centre and May Bank	Midway Car Park	Housing	100	N/A
Site 1	1.40	Gypsy and Traveller Sites	A53, near shell garage, Bradwell	Gypsy and Traveller	N/A	N/A
Site 2	0.59	Gypsy and Traveller Sites	Land at Loomer Road, Holditch& Chesterton	Gypsy and Traveller	N/A	N/A
Site 3	0.79	Gypsy and Traveller Sites	Paddocks off Wereton Road, Audley	Gypsy and Traveller	N/A	N/A
Site 4	0.56	Gypsy and Traveller Sites	Land off Parkhouse Industrial Estate	Gypsy and Traveller	N/A	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
			(West), Holditch & Chesterton			
Site 5	1.65	Gypsy and Traveller Sites	Land at Whitmore Road, Westlands	Gypsy and Traveller	N/A	N/A
Site 6	1.87	Gypsy and Traveller Sites	Birchenwood way, Kidsgrove	Gypsy and Traveller	N/A	N/A
Site 7	0.03	Gypsy and Traveller Sites	Land east of Station Road, Newchapel	Gypsy and Traveller	N/A	N/A
Site 8	2.60	Gypsy and Traveller Sites	Land off Cemetery Road, Silverdale	Gypsy and Traveller	N/A	N/A
Site 9	0.57	Gypsy and Traveller Sites	Silverdale Road Site (adj to Rowan Court)	Gypsy and Traveller	N/A	N/A
Site 10	0.75	Gypsy and Traveller Sites	Silverdale Road Site (Opp Ironbrige Drive)	Gypsy and Traveller	N/A	N/A
Site 11	0.81	Gypsy and Traveller Sites	Land at Hardingswood, Kidsgrove	Gypsy and Traveller	N/A	N/A

F.2 SA Objective 1: Climate Change

F.2.1 Opportunities for Renewable / Low Carbon Energy

- F.2.1.1 Based on the Staffordshire County-wide Climate Change Adaptation and Mitigation Study (2020), sites have been considered for their potential to facilitate Low and Zero Carbon (LZC) technologies. The site assessment is based on spatial data indicating the areas with opportunities to draw energy supply from a decentralised, renewable, or low carbon energy supply systems provided by the Council.
- F.2.1.2 Site WS9 and BL18 wholly coincide with County Council-owned 'LZC opportunity areas', indicating that the proposed development on the sites could result in the loss of land with high potential suitability for renewable energy developments. As a result, the proposed development of housing on the sites could result in a minor negative impact on climate change.
- F.2.1.3 On the other hand, 18 sites could potentially have a minor positive impact on climatic factors within Newcastle-under-Lyme Borough as they coincide with regions of less constrained 'potential opportunity areas for LZC'. The proposed development in these areas of known opportunities could draw energy supply from decentralised, renewable, or low carbon energy supply systems, resulting in a minor positive impact on climate change.
- F.2.1.4 For the remaining 16 sites, although they do not coincide with any of the opportunity regions for LZC technologies, the effect of the proposed development is uncertain at this stage of the site assessments and will depend upon implementation.

Table F.2.1: Sites impact matrix for SA Objective 1 – Climate Change

Site Ref	Proposed Site Use	Renewable Energy
AB2	Employment	+
AB24	Housing	+
HM20	Housing	+
HM23	Housing	+
HM62	Housing	+/-
HM63	Housing	+
CT1	Housing	+
CT21	Housing	+/-
HD10	Employment	+
WS9	Housing	-
KL22	Housing	+
BL31	Housing	+
RC11	Housing	+
HM7	Housing	+/-
MD29	Housing	+/-
LW24	Housing	+/-
LW91	Housing	+/-
NC5	Housing	+
SP11(1)	Mixed use	+
SP11(2)	Housing	+
SP11(3)	Housing	+
SP11(4)	Housing	+
SP23	Housing	+
BW1	Employment	+
BL4	Housing	+/-
BL18	Housing	-
TK29	Housing	+
TC19	Housing	+/-
TC20	Housing	+/-
TC50	Housing	+/-
TC52	Housing	+/-
TC71	Housing	+/-
Site 8	Gypsy and Traveller	+/-
Site 9	Gypsy and Traveller	+/-
Site 10	Gypsy and Traveller	+/-
Site 11	Gypsy and Traveller	+/-

F.3 SA Objective 2: Air

F.3.1 Air Quality Management Area

- F.3.1.1 'Kidsgrove', 'Maybank, Wolstanton, Porthill', and 'Newcastle-under-Lyme Town' Air Quality Management Areas (AQMAs) lie within the Newcastle-under-Lyme Borough boundary. Besides these three AQMAs, the borough also borders Stoke-on-Trent in the east which is wholly designated as an AQMA. A total of 10 sites (BL4, BW1, RC11, TC19, TC20, TC50, TC52, TC71, WS9 and Site 11) either coincide with, or are located within 200m of, one or more of these designated AQMAs.
- F.3.1.2 The proposed development at these 10 sites will be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.
- F.3.1.3 For the proposed development at the remaining sites which are over 200m away from an AQMA, a negligible impact is expected.

F.3.2 Main Road

- F.3.2.1 Several major roads such as A34, A51, A53, A500, A525 and A527 pass through Newcastle-under-Lyme Borough. These also include ring roads and intersections that lie within the borough boundary, such as within Newcastle-under-Lyme Town Centre. Moreover, the M6 motorway passes through several site clusters (Audley, Keele, Madeley & Betley, and Maer & Whitmore). A total of 19 sites lie either adjacent to (AB2, KL22, BL31, HM7, TK29, TC50, TC52, TC71), or within 200m of (CT1, MD29, SP11(1), SP11(2), SP23, BL18, Site 11, WS9, BL4, TC19, TC20), one or more of these major roads.
- F.3.2.2 The proposed development at these 19 sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads will be expected to have a minor negative impact on air quality at these sites. For the proposed development at the remaining sites which are over 200m away from a main road, a negligible impact on transport associated air pollution is expected.

Table F.3.1: Sites impact matrix for SA Objective 2 – Air

Site Ref	Proposed Site Use	AQMA	Main Road
AB2	Employment	0	-
AB24	Housing	0	0
HM20	Housing	0	0
HM23	Housing	0	0
HM62	Housing	0	0
HM63	Housing	0	0
CT1	Housing	0	-
CT21	Housing	0	0
HD10	Employment	0	0
WS9	Housing	-	-
KL22	Housing	0	-
BL31	Housing	0	-
RC11	Housing	-	0
HM7	Housing	0	-
MD29	Housing	0	-
LW24	Housing	0	0
LW91	Housing	0	0
NC5	Housing	0	0
SP11(1)	Mixed use	0	-
SP11(2)	Housing	0	-
SP11(3)	Housing	0	0
SP11(4)	Housing	0	0
SP23	Housing	0	-
BW1	Employment	-	0
BL4	Housing	-	-
BL18	Housing	0	-
TK29	Housing	0	-
TC19	Housing	-	-
TC20	Housing	-	-
TC50	Housing	-	-
TC52	Housing	-	-
TC71	Housing	-	-
Site 8	Gypsy and Traveller	0	0
Site 9	Gypsy and Traveller	0	0
Site 10	Gypsy and Traveller	0	0
Site 11	Gypsy and Traveller	-	-

F.4 SA Objective 3: Biodiversity, Flora and Fauna

F.4.1 European Sites

- F.4.1.1 European sites (also known as 'Habitats sites') provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within Europe. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, paragraph 187 of the NPPF (2023) requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated habitats sites.
- F.4.1.2 Two European sites are located within the boundary of Newcastle-under-Lyme Borough, 'Midland Meres and Moses- Phase 1' Ramsar and 'Midland Meres and Moses- Phase 2' Ramsar. No Zones of Influence (ZoI) have currently been identified for the Ramsar sites or other surrounding Habitats sites, and so at this stage of the assessment process, the potential impact of each development site is uncertain.
- F.4.1.3 It should be noted that the impact of proposed development sites in the Local Plan on Habitats sites will be tested through the Habitats Regulations Assessment (HRA) process, the findings of which will be used to inform the SA. The HRA will provide further detail relating to potential impacts on European sites within and surrounding the Plan area.

F.4.2 Sites of Special Scientific Interest

- F.4.2.1 There are several Sites of Special Scientific Interest (SSSI) within Newcastle-under-Lyme Borough, and these are located in the wards Loggerheads, Maer & Whitmore, Madeley & Betley and Silverdale.
- F.4.2.2 Site HM7 proposed for residential use is located approximately 230m from 'Betley Mere' SSSI and is located within an SSSI Impact Risk Zone (IRZ) that states "*any residential developments outside of existing settlements/urban areas with a total net gain in residential units*" should be consulted on with Natural England. Therefore, the proposed development at this site could potentially have a minor negative impact on the nearby SSSI.
- F.4.2.3 None of the other reasonable alternative sites assessed at this stage are located within IRZs which indicate the proposed use as a threat to nearby SSSIs and are therefore likely to have a negligible impact.

F.4.3 National Nature Reserves

- F.4.3.1 There are no National Nature Reserves (NNR) within Newcastle-under-Lyme Borough, with the nearest being 'Hulme Quarry' NNR in the east (approximately 6.7km away) and 'Wybunbury Moss' NNR in the west (approximately 4.3km away). None of the 26 sites are

located within close proximity to these NNRs, and therefore the proposed development at all the sites will be expected to have a negligible impact.

F.4.4 Ancient Woodland

F.4.4.1 There are several areas of ancient woodland in Newcastle-under-Lyme Borough. A total of 12 sites are in close proximity to ancient woodland. For instance, Site HD10 is located approximately 80m from an unnamed stand of ancient woodland, and Sites TK29 and BW1 are located approximately 220m and 550m respectively from 'Harecastle Clump'. The proposed development at these 12 sites could potentially have a minor negative impact on ancient woodland, due to an increased risk of disturbance.

F.4.4.2 The remaining reasonable alternative sites are not in close proximity to any areas of ancient woodland, and therefore a negligible impact could be expected.

F.4.5 Local Nature Reserves

F.4.5.1 Bathpool Park, Bradwell Woods, Bateswood and Pool Dam Marshes are Local Nature Reserves (LNRs) that lie within the boundary of Newcastle-under-Lyme Borough. Gypsy and Traveller Site 10 is located adjacent to Pool Dam Marshes LNR, and Site 9 is located approximately 30m from this LNR. Furthermore, two residential sites are located within close proximity to Bathpool Park LNR (TK29 approximately 210m and BL18 approximately 96m), alongside employment site BW1 located 10m (across the road) to Bathpool Park LNR. Residential site HM23 is located 280m from Bateswood LNR. The proposed development at these six sites could potentially have a minor negative impact on the LNRs due to increased development related threats and pressures.

F.4.5.2 The majority of the sites are deemed unlikely to significantly impact these LNRs, primarily due to being separated by existing built form, and therefore a negligible impact could be expected on the remaining 30 sites.

F.4.6 Sites of Biological Importance and Biodiversity Alert Sites

F.4.6.1 Based on their diversity when scored against the selection criteria for Local Wildlife Sites (LWS) in Staffordshire, the LWS are further categorised into Sites of Biological Importance (SBI) and Biodiversity Alert Sites (BAS).

F.4.6.2 Site HD10 almost wholly coincides with Apedale Disused Tips BAS and additionally is located 80m from Watermills Wood SBI. Site SP23 partially coincides with Silverdale BAS. Site RC11 partially coincides with Birchenwood Park SBI. Site BL18 partially coincides with Bathpool Park SBI. The proposed development at these four sites could potentially have a direct major negative impact on Apedale Disused Tips BAS, Silverdale BAS, Birchenwood Park SBI, and Blackpool Park SBI.

F.4.6.3 A further 14 sites lie adjacent or in close proximity to either an SBI or BAS, and therefore could potentially have either minor negative or indirect impacts on these designated sites.

- F.4.6.4 Development proposals at the sites which are not located in proximity to any of the SBIs and BAS within the borough boundary will be expected to have negligible impact on the receptor.

F.4.7 Priority Habitats

- F.4.7.1 Newcastle-Under-Lyme Borough supports a wide range of priority habitats. Most of these constitute 'deciduous woodland' and 'coastal and floodplain grazing marsh'.
- F.4.7.2 There are 11 sites that coincide with priority habitat located within Newcastle-under-Lyme including, deciduous woodland, good quality semi-improved grassland, and lowland fens. The proposed development at these 11 sites could potentially result in the loss or degradation of these habitats, and therefore result in a minor negative impact on the overall presence of priority habitats across the Plan area.
- F.4.7.3 The 25 sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

F.4.8 Regionally Important Geological Sites

- F.4.8.1 Several Regionally Important Geological Sites (RIGS) have been identified within and around Newcastle-under-Lyme Borough which include a range of notable geological features and formations. None of the 36 sites are located in proximity to any RIGS, and as such, all sites will be expected to have a negligible impact on the receptor.

F.4.9 Habitat Distinctiveness

- F.4.9.1 Habitat distinctiveness across the borough has been mapped by Staffordshire Wildlife Trust and Staffordshire Ecological Record using Phase 1 habitat data and with reference to guidance provided in the Biodiversity Net Gain Metric 3.1. Five 'distinctiveness' bands have been identified: Very High, High, Medium, Low and Very Low.
- F.4.9.2 Based on the spatial data for habitat distinctiveness provided by the Council, the proposed development at three of the sites (TC20, TC50, and Gypsy and Traveller Site 11) could potentially have a minor positive impact as they are located outside the study area. A total of 14 sites coincide with regions of 'low' and/or 'very low' distinctiveness and the proposed development is anticipated to have negligible impact.
- F.4.9.3 Five sites (BL4, HD10, SP11(2), SP23, and Gypsy and Traveller Site 9) could potentially have major negative impacts as they have been found to coincide with regions of 'high' and/or 'very high' distinctiveness, whereas the remaining 14 sites could have minor negative impact as they coincide with regions of 'medium' distinctiveness.

Table F.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, Flora and Fauna

Site Ref	Proposed Site Use	European Site	SSSI IRZ	NNR	Ancient Woodland	LNR	SBI/ BAS	Priority Habitat	RIGS	Distinctiveness
AB2	Employment	+/-	0	0	-	0	-	-	0	-
AB24	Housing	+/-	0	0	0	0	0	0	0	-
HM20	Housing	+/-	0	0	0	0	-	0	0	0
HM23	Housing	+/-	0	0	0	-	0	0	0	0
HM62	Housing	+/-	0	0	0	0	-	0	0	0
HM63	Housing	+/-	0	0	0	0	0	0	0	0
CT1	Housing	+/-	0	0	-	0	0	-	0	0
CT21	Housing	+/-	0	0	0	0	-	-	0	-
HD10	Employment	+/-	0	0	-	0	--	-	0	--
WS9	Housing	+/-	0	0	0	0	0	-	0	0
KL22	Housing	+/-	0	0	0	0	-	0	0	-
BL31	Housing	+/-	0	0	0	0	0	0	0	-
RC11	Housing	+/-	0	0	0	0	--	0	0	-
HM7	Housing	+/-	-	0	0	0	-	0	0	-
MD29	Housing	+/-	0	0	-	0	0	0	0	0
LW24	Housing	+/-	0	0	0	0	-	0	0	-
LW91	Housing	+/-	0	0	0	0	0	0	0	0
NC5	Housing	+/-	0	0	0	0	-	0	0	0
SP11(1)	Mixed use	+/-	0	0	-	0	-	-	0	-
SP11(2)	Housing	+/-	0	0	-	0	-	-	0	--
SP11(3)	Housing	+/-	0	0	-	0	-	-	0	0
SP11(4)	Housing	+/-	0	0	-	0	0	0	0	-
SP23	Housing	+/-	0	0	-	0	--	0	0	--
BW1	Employment	+/-	0	0	-	-	-	0	0	-
BL4	Housing	+/-	0	0	0	0	0	-	0	--
BL18	Housing	+/-	0	0	-	-	--	-	0	-
TK29	Housing	+/-	0	0	-	-	-	0	0	-
TC19	Housing	+/-	0	0	0	0	0	0	0	0
TC20	Housing	+/-	0	0	0	0	0	0	0	+
TC50	Housing	+/-	0	0	0	0	0	0	0	+
TC52	Housing	+/-	0	0	0	0	0	0	0	0
TC71	Housing	+/-	0	0	0	0	0	0	0	0
Site 8	Gypsy and Traveller	+/-	0	0	0	0	-	0	0	0
Site 9	Gypsy and Traveller	+/-	0	0	0	-	0	0	0	--
Site 10	Gypsy and Traveller	+/-	0	0	0	-	0	0	0	-
Site 11	Gypsy and Traveller	+/-	0	0	0	0	0	-	0	+

F.5 SA Objective 4: Natural Resources and Waste

F.5.1 Efficient Use of Land and Soil Resources

- F.5.1.1 Newcastle-Under-Lyme Borough is home to a mixture of rural, urban, and sub-urban settings, creating a unique landscape, with the vast majority of the urban area located to the north east and east of the borough.
- F.5.1.2 For six of the reasonable alternative sites for development, these wholly comprise previously developed land (TC19, TC20, TC50, TC52, TC71, and Gypsy and Traveller Site 11). Development proposed at these sites is therefore expected to have a minor positive impact on natural resources as development will be classed as an efficient use of land.
- F.5.1.3 The majority of the reasonable alternative sites wholly or partially comprise previously undeveloped land. A total of 14 sites (AB2, AB24, BL31, KL22, HM7, LW91, MD29, SP11(1), SP11(2), SP11(3), SP11(4), SP23, and Gypsy and Traveller Site 8 and Site 10) coincide with moderate to very good quality land (ALC Grade 2 and 3). Site AB2 is over 20ha and will be expected to have a major negative impact due to the significant loss of potential BMV land, and the remaining 13 sites will be expected to have a minor negative impact on BMV land.
- F.5.1.4 The remaining 17 sites which are wholly or partially undeveloped will have a minor positive impact on conserving Newcastle-under-Lyme Borough's BMV land and natural resources as they are within the regions of ALC Grade 4, or land classed as 'urban' or 'non-agricultural'.
- F.5.1.5 Another three sites (HD10, TC20 and WS9) coincide with historic landfill sites, representing potential contaminated land. Development at these locations could lead to major positive effects on natural resources and the efficient use of land assuming that the land will be remediated prior to development.

F.5.2 Mineral Safeguarding Areas

- F.5.2.1 Newcastle-under-Lyme contains several Mineral Safeguarding Areas (MSAs); these are primarily 'Bedrock Sand', 'Brick Clay', 'Coal Fire Clay', and 'Superficial Sand and Gravel'.
- F.5.2.2 A total of 34 of the reasonable alternative sites coincide with MSAs and therefore non-minerals development in these areas have the potential for sterilisation of the mineral resources, meaning that the mineral resources will be inaccessible for potential extraction in the future. Therefore, development at these sites could potentially have a minor negative impact on the natural resources of the surrounding area.
- F.5.2.3 The remaining two sites (LW24 and TC50) which do not coincide with any MSAs will be expected to have a negligible impact on mineral resources.

F.5.3 Household Waste

F.5.3.1 An increase in household waste generation is likely due to an increase in local population as a result of the new development. A total of 22 of the reasonable alternative sites for development are within an approximate 10-minute drive from household waste recycling centres, and therefore can be expected to have a major positive impact on waste management in the local area. For 14 of the reasonable alternative sites for development, these are located within an approximate 20-minute drive, or 30-minute drive if situated in a rural area from household waste recycling centres, and therefore can be expected to have a minor positive impact on waste management in the local area.

Table F.5.1: Sites impact matrix for SA Objective 4 – Natural Resources and Waste

Site Ref	Proposed Site Use	Land & Soil	MSA	Waste
AB2	Employment	--	-	+
AB24	Housing	-	-	+
HM20	Housing	+	-	++
HM23	Housing	+	-	++
HM62	Housing	+	-	++
HM63	Housing	+	-	++
CT1	Housing	+	-	++
CT21	Housing	+	-	+
HD10	Employment	++	-	+
WS9	Housing	++	-	++
KL22	Housing	-	-	++
BL31	Housing	-	-	+
RC11	Housing	+	-	+
HM7	Housing	-	-	++
MD29	Housing	-	-	++
LW24	Housing	+	0	+
LW91	Housing	-	-	+
NC5	Housing	+	-	++
SP11(1)	Mixed use	-	-	++
SP11(2)	Housing	-	-	++
SP11(3)	Housing	-	-	++
SP11(4)	Housing	-	-	++
SP23	Housing	-	-	++
BW1	Employment	+	-	++
BL4	Housing	+	-	+
BL18	Housing	+	-	+
TK29	Housing	+	-	++
TC19	Housing	+	-	++
TC20	Housing	++	-	++
TC50	Housing	+	0	++
TC52	Housing	+	-	++
TC71	Housing	+	-	++
Site 8	Gypsy and Traveller	-	-	+
Site 9	Gypsy and Traveller	+	-	+
Site 10	Gypsy and Traveller	-	-	+
Site 11	Gypsy and Traveller	+	-	+

F.6 SA Objective 5: Flooding

F.6.1 Flood Zones

- F.6.1.1 Flood Zones 2, 3a and 3b within Newcastle-Under-Lyme occur alongside the Lyme Brook and Ashfield Brook in the east, with Flood Zones 2 and 3a occurring alongside the River Lea in the west of the borough. The SA evaluation has taken into account the proportion of the site (based on the red line boundary provided) which lies within each zone.
- F.6.1.2 More than 10% of the Sites HD10 and Gypsy and Traveller Site 9 are located within Flood Zones 2, 3a and/or 3b. For Site HD10, approximately 12% lies within Flood Zone 2, 9% within Flood Zone 3a and 8% within Flood Zone 3b. For Site 9, the site lies wholly within Flood Zones 2 and 3a, and approximately 51% within Flood Zone 3b. The proposed development at these two sites could potentially have a major negative impact on flooding in the area.
- F.6.1.3 For Site AB2, less than 10% of the site area coincides with areas of flood risk (approximately 2.6% of Flood Zone 2a, and 1.3% of 3a). For Gypsy and Traveller Site 10, less than 10% of the site area coincides with areas of flood risk (approximately 1.3% of the site within Flood Zone 3b). For Gypsy and Traveller Site 11, less than 10% of the site area coincides with areas of flood risk (approximately 4.5% of the site within Flood Zone 2a, and 3.2% within Flood Zone 3a). Therefore, the proposed development at these sites could potentially have a minor negative impact on flooding in the area.
- F.6.1.4 The remaining 31 sites which are located wholly within Flood Zone 1 will be expected to have a minor positive impact on flooding, as the proposed development will be likely to locate site end users away from areas at risk of fluvial flooding.

F.6.2 Surface Water Flood Risk

- F.6.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in Newcastle-Under-Lyme is prevalent, and in particular affects roads and pathways within urban areas. The SA evaluation has taken into account the proportion of the site (based on the red line boundary provided) which lies within each zone.
- F.6.2.2 A total of 11 of the reasonable alternative sites (HD10, BL31, RC11, BW1, BL4 and Gypsy and Traveller Sites 9 and 10) have been identified where 50% or more of the site coincides with low SWFR, 10% or more of the site coincides with medium SWFR, or 1% or more coincides with high SWFR. The proposed development at these sites will be expected to have a major negative impact on surface water flooding. For 14 of the reasonable alternative sites (HM20, HM62, CT21, WS9, HM7, LW91, NC5, TK29, TC52 and Gypsy and Traveller Site 8), these coincide with 1-50% of low and/or 1-10% of medium SWFR and are therefore expected to have a minor negative impact on surface water flooding. Development at these locations is likely to locate site end users in areas risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

- F.6.2.3 The proposed development at the remaining 11 sites which do not coincide with any significant areas of SWFR is expected to have a negligible impact on surface water flooding.

Table F.6.1: Sites impact matrix for SA Objective 5 – Flooding

Site Ref	Proposed Site Use	Fluvial Flooding	SWFR
AB2	Employment	-	--
AB24	Housing	+	0
HM20	Housing	+	-
HM23	Housing	+	0
HM62	Housing	+	-
HM63	Housing	+	0
CT1	Housing	+	-
CT21	Housing	+	-
HD10	Employment	--	--
WS9	Housing	+	-
KL22	Housing	+	0
BL31	Housing	+	--
RC11	Housing	+	--
HM7	Housing	+	-
MD29	Housing	+	--
LW24	Housing	+	0
LW91	Housing	+	-
NC5	Housing	+	-
SP11(1)	Mixed use	+	-
SP11(2)	Housing	+	-
SP11(3)	Housing	+	-
SP11(4)	Housing	+	0
SP23	Housing	+	0
BW1	Employment	+	--
BL4	Housing	+	--
BL18	Housing	+	--
TK29	Housing	+	-
TC19	Housing	+	0
TC20	Housing	+	0
TC50	Housing	+	0
TC52	Housing	+	-
TC71	Housing	+	0
Site 8	Gypsy and Traveller	+	-
Site 9	Gypsy and Traveller	--	--
Site 10	Gypsy and Traveller	-	--
Site 11	Gypsy and Traveller	-	--

F.7 SA Objective 6: Water

F.7.1 Water Quality

- F.7.1.1 Newcastle-Under-Lyme's watercourse network largely comprises rivers/streams, with notable watercourses being the Lyme Brook which is a tributary stream of the River Trent and the River Lea that flows through Madeley. Gypsy and Traveller Site 9 lies adjacent to the Lyme Brook, and Gypsy and Traveller Site 11 lies adjacent to the Trent and Mersey Canal. The proposed development at these sites could potentially increase the risk of contamination of the adjacent watercourses, and therefore have a minor negative impact on water quality.
- F.7.1.2 The remaining sites lie beyond 10m from a watercourse. It should be noted that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. At this stage, the potential effects of all other sites on water quality are uncertain and will depend upon implementation.

F.7.2 Groundwater SPZ

- F.7.2.1 Source Protection Zones (SPZs) for groundwater within Newcastle-Under-Lyme are mainly located to the south of the borough, with smaller areas covered in the north. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. Three of the reasonable alternative sites (AB2, AB24, and LW24) are located wholly or partially within the total catchment (SPZ 3). The proposed development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining 33 sites do not coincide with any SPZ.

Table F.7.1: Sites impact matrix for SA Objective 6 – Water

Site Ref	Proposed Site Use	Watercourse	SPZ
AB2	Employment	+/-	-
AB24	Housing	+/-	-
HM20	Housing	+/-	0
HM23	Housing	+/-	0
HM62	Housing	+/-	0
HM63	Housing	+/-	0
CT1	Housing	+/-	0
CT21	Housing	+/-	0
HD10	Employment	+/-	0
WS9	Housing	+/-	0
KL22	Housing	+/-	0
BL31	Housing	+/-	0
RC11	Housing	+/-	0
HM7	Housing	+/-	0
MD29	Housing	+/-	0
LW24	Housing	+/-	-
LW91	Housing	+/-	0
NC5	Housing	+/-	0
SP11(1)	Mixed use	+/-	0
SP11(2)	Housing	+/-	0
SP11(3)	Housing	+/-	0
SP11(4)	Housing	+/-	0
SP23	Housing	+/-	0
BW1	Employment	+/-	0
BL4	Housing	+/-	0
B;18	Housing	+/-	0
TK29	Housing	+/-	0
TC19	Housing	+/-	0
TC20	Housing	+/-	0
TC50	Housing	+/-	0
TC52	Housing	+/-	0
TC71	Housing	+/-	0
Site 8	Gypsy and Traveller	+/-	0
Site 9	Gypsy and Traveller	-	0
Site 10	Gypsy and Traveller	+/-	0
Site 11	Gypsy and Traveller	-	0

F.8 SA Objective 7: Cultural Heritage

F.8.1 Grade I Listed Buildings

- F.8.1.1 There are three Grade I Listed Buildings in Newcastle-Under-Lyme, 'Church of All Saints', 'Church of St Margaret', and 'Whitmore Hall'. All 36 reasonable alternative sites in Newcastle-under-Lyme are unlikely to significantly impact any of the Grade I Listed Buildings.

F.8.2 Grade II* Listed Buildings

- F.8.2.1 A total of 24 Grade II* Listed Buildings can be found in Newcastle-Under-Lyme. These buildings are distributed evenly across the borough, although a large proportion are located to the east. All 36 reasonable alternative sites in Newcastle-under-Lyme are unlikely to significantly impact any of the Grade II* Listed Buildings.

F.8.3 Grade II Listed Buildings

- F.8.3.1 338 Grade II Listed Buildings can be found in Newcastle-under-Lyme, with large clusters found within urban areas. Eight of the reasonable alternative sites are located in close proximity to a Grade II Listed Building. Site RC11 comprises a large area of undeveloped land located approximately 660m from 'James Brindley Memorial approximately 10 yards south east of Church of St James'. Site HM7 lies 140m from 'Ravenshall Farmhouse'. Site LW91 is located 75m from 'Aston Manor Farmhouse'. Site BL4 is located 70m from 'Wood Shutt Farmhouse'. Site TC50 is located 30m from 'Ebenezer House'. Site MD29 is a large undeveloped site located 48.9m from 'Milepost at NGR' and 152m from 'Bridge Cottage (Part) Ye Olde House'. Sites SP11(1) and SP11(2) are both large undeveloped sites located in close proximity to 'Newcastle Lodge', SP11(1) located 185m and SP11(2) located 85m from the Grade II Listed Building. The proposed development at these eight sites could potentially lead to a minor negative impact on the setting of these listed buildings.

F.8.4 Conservation Area

- F.8.4.1 There are 21 Conservation Areas (CAs) located within Newcastle-under-Lyme, the majority of which are in the south and east of the borough. Site TC71 is located wholly within 'Newcastle Town Centre' CA, and Gypsy and Traveller Site 11 is located wholly within Trent and Mersey Canal, Hardings Wood CA. Both sites could potentially have a minor negative impact on the character of the CAs. A further seven sites are located in close proximity to a CA, Sites BL31 and BL4 to 'Trent and Mersey Canal, Hardings Wood' CA, Site TC19 to 'Stubbs Walks' CA, Site TC20 to 'The Brampton' CA, Sites TC50 and TC52 to 'Newcastle Town Centre' CA, and Site MD29 to Madeley CA. The proposed development at these seven sites could potentially result in a minor negative impact on the setting of CAs in Newcastle-under-Lyme.

F.8.5 Scheduled Monument

F.8.5.1 There are 13 Scheduled Monuments (SMs) located in Newcastle-under-Lyme, covering small historical features. All 36 reasonable alternative sites in Newcastle-under-Lyme will be unlikely to significantly impact any SMs.

F.8.6 Registered Park and Garden

F.8.6.1 Two Registered Parks and Gardens (RPGs) can be found within Newcastle-Under-Lyme, Maer Hall and Keele Hall. A total of five sites (SP11(1), SP11(2), SP11(3), SP11(4), and SP23) are located within close proximity to Keele Hall. All five sites are undeveloped and will likely impact the setting of the RPG. A minor negative impact is identified across all five sites for this receptor.

F.8.6.2 All remaining reasonable alternative sites in Newcastle-under-Lyme will be unlikely to significantly impact any RPGs.

Table F.8.1: Sites impact matrix for SA Objective 7 – Cultural heritage

Site Ref	Proposed Site Use	Grade I LB	Grade II* LB	Grade II LB	CA	SM	RPG
AB2	Employment	0	0	0	0	0	0
AB24	Housing	0	0	0	0	0	0
HM20	Housing	0	0	0	0	0	0
HM23	Housing	0	0	0	0	0	0
HM62	Housing	0	0	0	0	0	0
HM63	Housing	0	0	0	0	0	0
CT1	Housing	0	0	0	0	0	0
CT21	Housing	0	0	0	0	0	0
HD10	Employment	0	0	0	0	0	0
WS9	Housing	0	0	0	0	0	0
KL22	Housing	0	0	0	0	0	0
BL31	Housing	0	0	0	-	0	0
RC11	Housing	0	0	-	0	0	0
HM7	Housing	0	0	-	0	0	0
MD29	Housing	0	0	-	-	0	0
LW24	Housing	0	0	0	0	0	0
LW91	Housing	0	0	-	0	0	0
NC5	Housing	0	0	0	0	0	0
SP11(1)	Mixed use	0	0	-	0	0	-
SP11(2)	Housing	0	0	-	0	0	-
SP11(3)	Housing	0	0	0	0	0	-
SP11(4)	Housing	0	0	0	0	0	-
SP23	Housing	0	0	0	0	0	-
BW1	Employment	0	0	0	0	0	0
BL4	Housing	0	0	-	-	0	0
BL18	Housing	0	0	0	0	0	0
TK29	Housing	0	0	0	0	0	0
TC19	Housing	0	0	0	-	0	0
TC20	Housing	0	0	0	-	0	0
TC50	Housing	0	0	-	-	0	0

Site Ref	Proposed Site Use	Grade I LB	Grade II* LB	Grade II LB	CA	SM	RPG
TC52	Housing	0	0	0	-	0	0
TC71	Housing	0	0	0	-	0	0
Site 8	Gypsy and Traveller	0	0	0	0	0	0
Site 9	Gypsy and Traveller	0	0	0	0	0	0
Site 10	Gypsy and Traveller	0	0	0	0	0	0
Site 11	Gypsy and Traveller	0	0	0	-	0	0

F.9 SA Objective 8: Landscape

F.9.1 Landscape Character

- F.9.1.1 Baseline data on Landscape Character Types (LCT) and Landscape Character Areas (LCA) within the Plan area are derived from the Landscape and Settlement Character Assessment (LSCA) (2022)³. 15 of the reasonable alternative sites could potentially lead to loss or degradation of key landscape features or contradict with the guidelines of the LCA in question; therefore, will be expected to have a minor negative impact on the landscape character.
- F.9.1.2 This includes potential loss of pockets of farmland, pastoral land, distinctive field pattern and/or hedgerows within 'Apedale Coalfield Farmlands' at Sites HM20, HM23 and HD10, within 'South Kidsgrove Coalfield Farmlands' at Sites RC11 and CT1, within 'Betley Ancient Clay Farmlands' at Site HM7, within 'East Kidsgrove Coalfield Farmlands' at Site NC5, 'Keele Ancient Redland Farmlands' at Sites SP11 (1), SP11(2), SP11(3), SP11(4), SP23, at 'Audley Ancient Farmlands' at Site AB2, and 'Madeley Ancient Redland Farmlands' at Site MD29.
- F.9.1.3 The remaining 21 sites are either deemed unlikely to significantly affect the key characteristics of the LCA in which they are located, or are located within the urban area and outside the LSCA study area. A negligible impact has been identified for these 20 sites.

F.9.2 Landscape Sensitivity

- F.9.2.1 For 11 of the reasonable alternative sites (CT1, HM20, HM23, HM62, HM63, HD10, MD29, BL18, RC11, NC5 and TK29), these are located within areas identified as being of 'medium' sensitivity in the LSCA (2022), and are therefore identified to result in a minor impact on the landscape upon development. A total of 11 of the reasonable alternative sites (AB2, AB24, KL22, HM7, LW24, LW91, SP11(1), SP11(2), SP11(3), SP11(4) and SP23) are located within areas identified as being of 'high' sensitivity and are therefore identified to result in a major negative impact on the landscape.
- F.9.2.2 The remaining 14 sites are located outside the LSCA study area, and as such negligible impacts have been identified.

F.9.3 Green Belt

- F.9.3.1 The Green Belt Assessment was commissioned to review the potential release of Green Belt sites for development⁴, based on their contribution to the purposes of the Green Belt (weak, moderate, or strong). Further information has been made available regarding

³ Chris Blandford Associates (2022) Newcastle-under-Lyme Landscape & Settlement Character Assessment Study. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/401/landscape-and-settlement-character-assessment-study-2022-part-1> [Date accessed: 26/03/24]

⁴ Arup (2017) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment: Final Report Issue | 21 November 2017. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/11> [Date accessed: 26/03/24]

certain sites in the latest Green Belt Site Review (2024) document provided by the Council⁵ which has been used to inform the below assessments.

- F.9.3.2 A total of 16 reasonable alternative sites evaluated at this stage are located outside the Green Belt and therefore can be expected to result in a minor positive impact in terms of preserving the Green Belt.
- F.9.3.3 Six of the reasonable alternative sites (AB24, BL18, BL31, CT1, RC11 and TK29) are located within areas classified as making a 'weak' overall contribution to the purposes of the Green Belt, and therefore the proposed development at these sites will be likely to result in a negligible impact.
- F.9.3.4 Six of the reasonable alternative sites (HM20, HM23, HM62, HM63, BL31 and HM7) are located within the areas classified as making a 'strong' overall contribution to the purposes of the Green Belt, and therefore the proposed development at these sites will be likely to result in a major negative impact.
- F.9.3.5 Eight of the reasonable alternative sites (AB2, HD10, NC5, SP11(1), SP11(2), SP11(3), SP11(4) and SP23) are located within the areas classified as making a 'moderate' overall contribution to the purposes of the Green Belt, and the proposed development at these sites have been identified to result in a minor negative impact.
- F.9.3.6 Site KL22 is located within the Green Belt; however, the area in which this site lies has not been classified within the Green Belt Assessment and therefore it is uncertain whether the proposed development at this site will have any significant impact on the Green Belt purposes.

F.9.4 Alter Views for PRow Network Users

- F.9.4.1 A total of 24 of the reasonable alternative sites are identified as having the potential to alter the views of the countryside landscape experienced by users of the Public Right of Way (PRow) network upon development, owing to their proximity to the PRow network and when considering the surrounding land uses of the sites. A minor negative impact on the surrounding landscape has been identified for these 24 sites.
- F.9.4.2 The remaining sites are not in close proximity to, or considered likely to alter views from, the PRow network and will be likely to have a negligible impact in this assessment.

F.9.5 Urbanisation of the Countryside

- F.9.5.1 A total of 16 of the reasonable alternative sites are located outside of, or extend out of, the existing settlement pattern and are considered to increase the risk of urbanisation / sprawl of development into the surrounding countryside. The proposed development at these sites will be expected to have a minor negative impact on the landscape.

⁵ ARUP (2024) Newcastle-under-Lyme Council Green Belt Site Review: Consolidated Report. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base> [Date accessed: 04/07/24]

F.9.6 Coalescence

F.9.6.1 The proposed development at six sites (CT1, HM20, RC11, NC5, SP11(2) and SP11(3)) will be expected to increase the risk of reducing separation between existing settlements, leading to potential coalescence and loss of identity for these settlements. Site CT1 lies between the settlements Talke Pits and Red Street, Site HM20 lies between the settlements of Scot Hay and Silverdale, Site RC11 between Kidsgrove, Newchapel and Goldenhill (in Stoke-on-Trent) and Site NC5 between Harrishead and Kidsgrove/The Rookery, Sites SP11(2) and SO11(3) lie between the settlements of Keele and Silverdale. Therefore, a minor negative impact on the landscape has been identified at these three sites.

F.9.7 Tree Preservation Orders

F.9.7.1 The development at two reasonable alternative sites (MD29 and SP11(2)) coincide with trees protected by Tree Preservation Orders (TPO) and four reasonable alternative sites (SP11(1), SP11(3), SP11(4) and SP23) are located adjacent to a TPO. The development at all seven sites could potentially have a minor negative impact on the protected trees and their landscape settings.

F.9.7.2 All remaining reasonable alternative sites in Newcastle-under-Lyme will be unlikely to significantly impact any TPOs.

Table F.9.1: Sites impact matrix for SA Objective 8 – Landscape

Site Ref	Proposed Site Use	Landscape Character	Landscape Sensitivity	Green Belt	Views from the PRoW Network	Urbanisation of the Countryside	Coalescence	TPOs
AB2	Employment	-	--	-	-	-	0	0
AB24	Housing	0	--	0	0	0	0	0
HM20	Housing	-	-	--	-	-	-	0
HM23	Housing	-	-	--	-	-	0	0
HM62	Housing	0	-	--	-	0	0	0
HM63	Housing	0	-	--	-	0	0	0
CT1	Housing	-	-	0	-	-	-	0
CT21	Housing	0	0	+	0	0	0	0
HD10	Employment	-	-	-	-	0	0	0
WS9	Housing	0	0	+	-	0	0	0
KL22	Housing	0	--	+/-	0	0	0	0
BL31	Housing	0	0	--	0	0	0	0
RC11	Housing	-	-	0	-	-	-	0
HM7	Housing	-	--	--	-	-	0	0
MD29	Housing	-	-	+	-	-	0	-
LW24	Housing	0	--	+	-	-	0	0
LW91	Housing	0	--	+	0	-	0	0
NC5	Housing	-	-	-	-	-	-	0
SP11(1)	Mixed use	-	--	-	-	-	0	-

Site Ref	Proposed Site Use	Landscape Character	Landscape Sensitivity	Green Belt	Views from the PRow Network	Urbanisation of the Countryside	Coalescence	TPOs
SP11(2)	Housing	-	--	-	-	-	-	-
SP11(3)	Housing	-	--	-	-	-	-	-
SP11(4)	Housing	-	--	-	-	-	0	-
SP23	Housing	-	--	-	-	-	0	-
BW1	Employment	0	0	+	-	-	0	0
BL4	Housing	0	0	+	-	0	0	0
BL18	Housing	-	-	0	-	0	0	0
TK29	Housing	0	-	0	0	0	0	0
TC19	Housing	0	0	+	0	0	0	0
TC20	Housing	0	0	+	0	0	0	0
TC50	Housing	0	0	+	0	0	0	0
TC52	Housing	0	0	+	0	0	0	0
TC71	Housing	0	0	+	0	0	0	0
Site 8	Gypsy and Traveller	0	0	+	-	0	0	0
Site 9	Gypsy and Traveller	0	0	+	-	0	0	0
Site 10	Gypsy and Traveller	0	0	+	-	0	0	0
Site 11	Gypsy and Traveller	0	+	0	0	0	0	0

F.10 SA Objective 9: Health and Wellbeing

F.10.1 NHS Hospital with Accident & Emergency Department

F.10.1.1 Newcastle-under-Lyme does not contain any hospitals within its boundaries, although Royal Stoke University Hospital which provides an Accident and Emergency (A&E) department is located in the adjacent Stoke-on-Trent City. For 15 of the reasonable alternative sites, these are located within 5km of Royal Stoke University Hospital and are therefore identified as having a minor positive impact on access to emergency healthcare due to being within a sustainable distance to the services. The remaining 21 sites are located beyond 5km of a hospital and could potentially have a minor negative impact on sustainable access to emergency healthcare.

F.10.2 GP Surgery

F.10.2.1 According to data provided by the Council, Newcastle-under-Lyme is home to 49 GP Surgeries that serve the local communities, although southern areas of the borough such as Loggerheads and Maer and Whitmore have more restricted access to healthcare and the area sees less GP coverage.

F.10.2.2 One site, TC20, is located within 200m of a GP surgery and can therefore be expected to have a major positive impact on access to healthcare. Six of the reasonable alternative sites are located within 400m of a GP surgery and can therefore be expected to have a minor positive impact on access to healthcare. A total of 10 of the reasonable alternative sites are located within 800m of a GP surgery and therefore the proposed development at these sites will be expected to have a negligible impact on access to healthcare.

F.10.2.3 The remaining 19 sites are located beyond 800m from a GP surgery and could potentially have a minor negative impact on sustainable access to healthcare.

F.10.3 Leisure Facilities

F.10.3.1 Access to various leisure facilities is expected to help facilitate a healthy and active lifestyle. The majority of leisure facilities are located in the east of the borough towards Newcastle-under-Lyme Town Centre, leaving rural areas with more restricted access to leisure facilities.

F.10.3.2 Three of the reasonable alternative sites are located within 400m of a leisure facility, these being all within the Town Centre cluster (TC19, TC20 and TC50). The proposed development at all three sites will therefore be expected to have a major positive impact on sustainable access to leisure facilities. Two sites are located within 800m of leisure facilities, also within the Town Centre (TC52 and TC71). These two sites will therefore be expected to provide a minor positive impact in terms of access to leisure facilities.

F.10.3.3 Gypsy and Traveller Site 9 is located within 1.2km of leisure facilities and will be expected to have a negligible impact on access to leisure facilities.

- F.10.3.4 The remaining 30 reasonable alternative sites are located beyond 1.2km from leisure facilities, and therefore the proposed development at these sites could potentially have a minor negative impact on sustainable access to leisure facilities.

F.10.4 Access to and Provision of Open / Green Space

- F.10.4.1 Newcastle-under-Lyme includes various open spaces such as allotments, amenity greenspaces, cemeteries, churchyards, green corridors, natural and semi-natural greenspace, parks and gardens and provision for children and teenagers.
- F.10.4.2 The majority of sites have good access to open/green space. A total of 14 sites are within the catchment of four or more freely accessible green spaces and therefore can be expected to have a major positive impact on access to open/green space. Seven sites are within the catchment of two or three freely accessible open/green space and therefore can be expected to have a minor positive impact on access to open/green space. Additionally, six sites are within the catchment of one freely accessible green space and therefore can be expected to have a negligible impact on access to open/green space.
- F.10.4.3 Three sites, LW24, LW91 and MD29 are located outside the catchment of freely accessible open/green space and therefore could potentially have a minor negative impact on access to open/green space.
- F.10.4.4 Sites HD10, SP11(4) and Gypsy and Traveller Site 10 coincide with freely accessible open/green space (Apedale Waste Tips, Park Road Playing Fields and Silverdale Road Corridor, respectively) and therefore the proposed development at these three sites could potentially have a major negative impact on the provision of open/green space.
- F.10.4.5 Sites RC11, BL4 and Gypsy and Traveller Site 8 coincide with 'limited' or 'unconfirmed' open/green space (Parkhill Estates, Hardings Wood and The Acre Allotments, respectively) and therefore there is uncertainty surrounding the potential for a net loss of open/green space for these three sites.

Table F.10.1: Sites impact matrix for SA Objective 9 – Health and Wellbeing

Site Ref	Proposed Site Use	NHS Hospital	GP Surgery	Leisure Facilities	Open / Green Space
AB2	Employment	-	-	-	0
AB24	Housing	-	-	-	+
HM20	Housing	-	-	-	++
HM23	Housing	-	-	-	++
HM62	Housing	-	-	-	++
HM63	Housing	-	-	-	++
CT1	Housing	-	-	-	+
CT21	Housing	-	0	-	+
HD10	Employment	+	0	-	--
WS9	Housing	+	+	-	+
KL22	Housing	-	-	-	+
BL31	Housing	-	-	-	0
RC11	Housing	-	0	-	+/-
HM7	Housing	-	+	-	0
MD29	Housing	-	0	-	-
LW24	Housing	-	-	-	-
LW91	Housing	-	-	-	-
NC5	Housing	-	-	-	0
SP11(1)	Mixed use	+	-	-	0
SP11(2)	Housing	+	-	-	+
SP11(3)	Housing	+	-	-	++
SP11(4)	Housing	+	-	-	--
SP23	Housing	+	-	-	+
BW1	Employment	-	-	-	++
BL4	Housing	-	0	-	+/-
BL18	Housing	-	-	-	++
TK29	Housing	-	0	-	++
TC19	Housing	+	+	++	++
TC20	Housing	+	++	++	++
TC50	Housing	+	+	++	++
TC52	Housing	+	+	+	++
TC71	Housing	+	+	+	++
Site 8	Gypsy and Traveller	+	0	-	+/-
Site 9	Gypsy and Traveller	+	0	0	++
Site 10	Gypsy and Traveller	+	-	-	--
Site 11	Gypsy and Traveller	-	0	-	0

F.11 SA Objective 10: Equality

F.11.1 Housing Provision

- F.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites which have been identified as having capacity for 100 or more dwellings will be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less will be expected to result in a minor positive impact on housing provision.
- F.11.1.2 At this stage of assessment, 12 sites proposed for housing use have been identified by the Council as providing a capacity of 100 or more dwellings; therefore, a major positive impact on housing provision will be likely. The remaining 17 sites proposed for housing use will provide a capacity of 99 or less dwellings, leading to a minor positive impact on housing provision. Gypsy and Traveller Sites 8, 9, 10 and 11 will be likely to make a minor positive contribution towards housing provision for the Gypsy and Traveller community.
- F.11.1.3 Site AB2, HD10 and BW1 are proposed for employment use and will not be expected to result in a net change in housing provision; a negligible impact is therefore identified.

F.11.2 Deprivation

- F.11.2.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England⁶. Of the 316 local authorities in England, Newcastle-under-Lyme is ranked 159th most deprived⁷. According to the IMD (2019)⁸, Newcastle-under-Lyme Borough has an average IMD rank of 16,926. Two LSOAs in the borough fall within the 10% most deprived in England. Newcastle-under-Lyme has nine out of 80 neighbourhoods among the 20% most income-deprived in England, with these being located mainly around centres such as Newcastle-under-Lyme town centre and particularly towards central Chesterton.
- F.11.2.2 All 36 reasonable alternative sites assessed at this stage are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at these sites may have a negligible impact on equality.
- F.11.2.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

⁶ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 26/03/24]

⁷ Office for National Statistics (2021) Income Deprivation. Available at: <https://www.ons.gov.uk/visualisations/dvc1371/#/E07000195> [Date accessed: 26/03/24]

⁸ Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 26/03/24]

Table F.11.1: Sites impact matrix for SA Objective 10 – Equality

Site Ref	Proposed Site Use	Housing Provision	Deprivation
AB2	Employment	0	0
AB24	Housing	+	0
HM20	Housing	+	0
HM23	Housing	+	0
HM62	Housing	+	0
HM63	Housing	+	0
CT1	Housing	++	0
CT21	Housing	+	0
HD10	Employment	0	0
WS9	Housing	+	0
KL22	Housing	+	0
BL31	Housing	+	0
RC11	Housing	++	0
HM7	Housing	+	0
MD29	Housing	++	0
LW24	Housing	+	0
LW91	Housing	+	0
NC5	Housing	++	0
SP11(1)	Mixed use	++	0
SP11(2)	Housing	++	0
SP11(3)	Housing	++	0
SP11(4)	Housing	++	0
SP23	Housing	++	0
BW1	Employment	0	0
BL4	Housing	++	0
BL18	Housing	++	0
TK29	Housing	+	0
TC19	Housing	+	0
TC20	Housing	+	0
TC50	Housing	+	0
TC52	Housing	+	0
TC71	Housing	++	0
Site 8	Gypsy and Traveller	+	0
Site 9	Gypsy and Traveller	+	0
Site 10	Gypsy and Traveller	+	0
Site 11	Gypsy and Traveller	+	0

F.12 SA Objective 11: Transport and Accessibility

F.12.1 Bus Stop

- F.12.1.1 Newcastle-under-Lyme contains good public transport access with many bus stops located within the borough, offering strong connections to local residents and the wider community, especially surrounding the town centre of Newcastle-under-Lyme. Of the 36 reasonable alternative sites assessed at this stage, 14 sites are located within 200m of a bus stop; therefore, these sites will be expected to have a major positive impact on access to public transport. Eight sites are located within 400m of a bus stop and are expected to have a minor positive impact on access to public transport. A further 10 sites are located within 800m of a bus stop and are therefore expected to have a negligible impact on access to public transport. Four sites (AB2, LW24, LW91 and BW1) are located beyond 800m from a bus stop and therefore are deemed to have a minor negative impact on access to public transport.

F.12.2 Train Station

- F.12.2.1 All train stations are located towards the urban areas of the borough / neighbouring authorities, situated east towards Stoke-on-Trent or north of the borough where Kidsgrove Station is located. Site WS9 is located within 800m from Longport Station, and Sites BL31, BL4 and Gypsy and Traveller Site 11 are located within 800m of Kidsgrove Station. These four sites are therefore identified as having a minor positive impact on access to public transport. In addition, Site BL18 is located less than 1.2km from Kidsgrove Station, and has been identified as having a negligible impact on access to public transport.
- F.12.2.2 The remaining 31 sites are located over 1.2km from the nearest train station and therefore the proposed development at these sites could potentially have a minor negative impact on access to public transport.

F.12.3 Pedestrian Access

- F.12.3.1 Sites that are deemed to have good pedestrian access are those connected to existing pavements or pathways, segregated from traffic use in the area. This is likely to be the case for sites located in the built up, urban areas of the borough; however, many of the sites proposed for development are situated in a rural setting and can therefore have poor pedestrian access.
- F.12.3.2 A total of 24 of the reasonable alternative sites assessed at this stage are well connected to the existing footpath network and will therefore likely have a minor positive impact on local transport and accessibility. Utilising the existing footpath network will encourage travel by foot and reduce the requirement for new pedestrian access to be created. However, 12 sites have poor access to the existing footpath network. As a result, development at these 12 sites could potentially have a minor negative impact on local

accessibility and will require improvement of pedestrian access to the wider community in order for the sites to be considered a viable transport option.

F.12.4 Cycle Access

- F.12.4.1 Sites deemed to have good cycle access are those sites that can provide adequate access to the surrounding cycle network. 11 sites proposed for development have good access to the surrounding cycle network and will be expected to have a minor positive impact on access to public transport. The remaining 25 sites are not connected to the surrounding cycle network, and as such development at these sites could potentially have a minor negative impact on cycle access.

F.12.5 Access to Primary Schools

- F.12.5.1 There are 41 primary schools distributed throughout Newcastle-Under-Lyme.
- F.12.5.2 Site SP11 (1) is proposed to include the development of a new primary school and Gypsy and Traveller Site 9 is located within 200m of a primary school, and therefore these two sites will be expected to have a major positive impact on accessibility to primary schools. Nine sites (including eight housing sites, and Gypsy and Traveller Site 8) are located within 400m of a primary school and will therefore be expected to have a minor positive impact on accessibility to primary schools. 14 sites (including 12 housing sites, and Gypsy and Traveller Site 10 and 11) are located within 800m of a primary school and will therefore be expected to have a negligible impact on accessibility to primary schools. The remaining 9 housing sites are located beyond 800m from the nearest primary school and as such, the proposed development at these sites could potentially have a minor negative impact on accessibility to primary schools.
- F.12.5.3 Sites AB2, HD10 and BW1 are proposed for employment use and have not been included in this assessment.

F.12.6 Access to Secondary Schools

- F.12.6.1 There are nine secondary schools distributed throughout Newcastle-under-Lyme.
- F.12.6.2 Seven sites (including four housing sites, and Gypsy and Traveller Sites 9, 10 and 11) are located within 800m of a secondary school and can be expected to have a minor positive impact on accessibility to secondary schools. Eight of the proposed residential sites are located within 1.2km of a secondary school and can be expected to have a negligible impact on accessibility to secondary schools.
- F.12.6.3 However, the majority of sites (17 housing sites, and Gypsy and Traveller Site 8) have poor access to secondary schools, and as such, the proposed development at these sites could potentially have a minor negative impact on accessibility to secondary schools.
- F.12.6.4 Sites AB2, HD10 and BW1 are proposed for employment use and have not been included in this assessment.

F.12.7 Access to Employment Opportunities

- F.12.7.1 It is expected that Newcastle-under-Lyme will provide a range of employment opportunities for new and current residents, with the borough being home to various key employment areas. The majority of business parks and industrial estates are located to the east of the borough.
- F.12.7.2 14 of the proposed residential / Gypsy and Traveller sites are located within 400m of key employment areas and can be expected to have a major positive impact on access to employment opportunities. Nine sites are located within 800m of key employment areas and can be expected to have a minor positive impact on access to employment opportunities. A further four sites are located within 1.2km of key employment areas and can be expected to have a negligible impact on access to employment opportunities.
- F.12.7.3 Six of the proposed residential sites (KL22, RC11, HM7, LW24, LW91 and NC5) are located beyond 1.2km from key employment areas and as such, the proposed development at these sites could potentially have a minor negative impact on access to employment opportunities.
- F.12.7.4 Sites AB2, HD10 and BW1, are proposed for employment use and have not been included in this assessment.

F.12.8 Access to Local Services

- F.12.8.1 Newcastle-under-Lyme is home to various local services that are generally situated in the east of the borough towards urban centres. Good access to local services can encourage travel by foot.
- F.12.8.2 Three of the reasonable alternative sites in the Town Centre (TC50, TC52 and TC71) are located within 200m of local services, and Site SP11 (1) is proposed to include the development of a new local centre, and so the proposed development at these sites will be likely to have a major positive impact on access to local services. Four sites are located within 400m of local services and as such a minor positive impact on access to local services is identified. 14 sites are located within 800m of local services, with a negligible impact on access to local services identified.
- F.12.8.3 15 of the reasonable alternative sites are located beyond 800m from local services and as such, the proposed development at these sites could potentially have a minor negative impact on access to local services.

Table F.12.1: Sites impact matrix for SA Objective 11 – Transport and Accessibility

Site Ref	Proposed Site Use	Bus Stop	Train Station	Pedestrian Access	Cycle Access	Primary School	Secondary School	Employment	Local Services
AB2	Employment	-	-	-	-	0	0	0	-
AB24	Housing	0	-	+	-	-	-	0	-
HM20	Housing	++	-	-	-	-	-	+	-
HM23	Housing	+	-	-	-	-	-	0	-
HM62	Housing	0	-	-	-	0	-	0	-
HM63	Housing	++	-	+	-	+	-	0	-
CT1	Housing	+	-	+	-	0	-	+	-
CT21	Housing	++	-	+	-	0	+	++	0
HD10	Employment	0	-	-	-	0	0	0	-
WS9	Housing	0	+	+	+	0	-	+	0
KL22	Housing	++	-	+	-	-	-	-	0
BL31	Housing	++	+	+	-	-	0	++	-
RC11	Housing	0	-	+	+	-	-	-	-
HM7	Housing	++	-	+	-	-	-	-	-
MD29	Housing	+	-	-	-	+	0	+	0
LW24	Housing	-	-	-	-	-	-	-	-
LW91	Housing	-	-	-	-	-	-	-	-
NC5	Housing	+	-	-	-	0	0	-	0
SP11(1)	Mixed use	0	-	+	+	++	-	++	++
SP11(2)	Housing	0	-	+	+	0	-	+	0
SP11(3)	Housing	0	-	-	-	0	-	+	-
SP11(4)	Housing	0	-	+	-	+	-	++	0
SP23	Housing	0	-	+	+	0	0	++	0
BW1	Employment	-	-	+	+	0	0	0	-
BL4	Housing	+	+	-	-	+	+	++	0
BL18	Housing	++	0	+	+	0	0	+	+
TK29	Housing	++	-	+	-	0	-	+	0
TC19	Housing	++	-	+	+	+	0	++	+
TC20	Housing	++	-	+	-	0	0	++	0
TC50	Housing	++	-	+	-	+	+	++	++
TC52	Housing	++	-	+	+	+	0	++	++
TC71	Housing	++	-	+	-	+	+	++	++
Site 8	Gypsy and Traveller	+	-	-	-	+	-	++	+
Site 9	Gypsy and Traveller	+	-	+	+	++	+	++	0
Site 10	Gypsy and Traveller	++	-	+	-	0	+	+	+
Site 11	Gypsy and Traveller	+	+	+	+	0	+	++	0

F.13 SA Objective 12: Economy

F.13.1 Employment Floorspace Provision

- F.13.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- F.13.1.2 Of the 36 reasonable alternative sites assessed at this stage, 28 are proposed for housing, three are proposed for employment, four are proposed for Gypsy and Traveller use and one site (SP11(1)) is proposed for mixed use development of housing and a local centre.
- F.13.1.3 Site AB2, HD10 and BW1 are proposed for employment use. Sites AB2 currently comprises over 10ha of undeveloped land and will likely result in a significant net gain in employment floorspace and therefore result in a major positive impact on the provision of employment opportunities. Site BW1 currently comprises 6.5ha of undeveloped land, and the developable area of Site HD10 comprises 3.57ha undeveloped land. The proposed development at these two sites will likely result in a net gain in employment floorspace and therefore result in a minor positive impact on the provision of employment opportunities.
- F.13.1.4 Site TC19 coincides with 'Premier Convenience Store', Site TC71 coincides with 'Ludo Hire' and 'Nails by Annabel'. The proposed residential development at these two sites could potentially result in the loss of these small businesses and the employment opportunities they provide, leading to a minor negative impact on the local economy.
- F.13.1.5 Seven sites proposed for residential use coincide with existing employment sites where the presence of economic activity is currently unknown; Site BL31 coincides with agricultural buildings, and Sites TC20, TC50 and TC52 coincide with car parks within Newcastle-under-Lyme Town Centre, Gypsy and Traveller Site 11 coincides with a lorry park and Sites SP11(2), SP11(3) and SP11(4) coincide with Keele Golf Centre. It is uncertain whether the proposed development at these eight sites will result in a net loss of employment floorspace or hinder employment activity in the local area.
- F.13.1.6 Site SP11(1) is proposed for mixed use development of housing and a local centre; additionally, the site coincides with Keele Golf Centre. It is uncertain whether the proposed development at the site will result in a net loss of employment floorspace or hinder employment activity in the local area.
- F.13.1.7 The remaining 22 sites proposed for residential or Gypsy and Traveller development reside on previously undeveloped land, and will not be expected to result in a net change in employment floorspace. Proposed development at these sites will be likely to have a negligible impact on the provision of employment opportunities.

Table F.13.1: Sites impact matrix for SA Objective 12 – Economy

Site Ref	Proposed Site Use	Employment Floorspace
AB2	Employment	++
AB24	Housing	0
HM20	Housing	0
HM23	Housing	0
HM62	Housing	0
HM63	Housing	0
CT1	Housing	0
CT21	Housing	0
HD10	Employment	+
WS9	Housing	0
KL22	Housing	0
BL31	Housing	+/-
RC11	Housing	0
HM7	Housing	0
MD29	Housing	0
LW24	Housing	0
LW91	Housing	0
SP11(1)	Mixed use	+/-
SP11(2)	Housing	+/-
SP11(3)	Housing	+/-
SP11(4)	Housing	+/-
SP23	Housing	0
NC5	Housing	0
BW1	Employment	+
BL4	Housing	0
BL18	Housing	0
TK29	Housing	0
TC19	Housing	-
TC20	Housing	+/-
TC50	Housing	+/-
TC52	Housing	+/-
TC71	Housing	-
Site 8	Gypsy and Traveller	0
Site 9	Gypsy and Traveller	0
Site 10	Gypsy and Traveller	0
Site 11	Gypsy and Traveller	+/-

Appendix G: Policy Assessments

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G.1 Overview

G.1.1 Introduction

- G.1.1.1 This appendix provides an assessment of the proposed Vision, Strategic Objectives and 55 policies proposed by NuLBC for the emerging Local Plan at the Regulation 19 stage.
- G.1.1.2 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) and are in accordance with the methodology as set out in the SA Main Report (**Volume 2**).
- G.1.1.3 For ease of reference the scoring system is summarised in **Table G.1.1** below.

Table G.1.1: *Presenting likely impacts*

Likely Impact	Description	Impact Symbol
Major positive impact	The proposed policy contributes to the achievement of the SA Objective to a significant extent.	++
Minor positive impact	The proposed policy contributes to the achievement of the SA Objective to some extent.	+
Negligible/ neutral impact	The proposed policy has no effect or a negligible effect on the achievement of the SA Objective.	0
Uncertain impact	The proposed policy has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor negative impact	The proposed policy prevents the achievement of the SA Objective to some extent.	-
Major negative impact	The proposed policy prevents the achievement of the SA Objective to a significant extent.	--

- G.1.1.4 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- G.1.1.5 The sustainability performance of each policy is assessed in isolation from other proposed policies. Where negative effects are identified, there is the potential for other policies to mitigate these impacts. The main Regulation 19 SA Report (see **Volume 2**) considers the residual impacts of the Local Plan and the overall mitigating effects of all policies.
- G.1.1.6 The policies assessed within this appendix were based on the most up to date policy wording at the time of assessment, provided by NuLBC on 17th June 2024. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording changes to the policies compared to that within the Consultation version of the Plan.

G.1.2 Overview of policy assessments

G.1.2.1 The impact matrices for all policy assessments are presented in **Table G.1.2**. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table G.1.2: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
Vision	+/-	+/-	+	+	+	+	+	++	+	++	+/-	++
Objectives	++	+	+	+	+	+	+	++	++	++	++	++
PSD1	--	-	-	-	+/-	-	+/-	+/-	-	++	+/-	++
PSD2	+	-	-	-	-	-	-	-	+	++	+	++
PSD3	+	-	-	-	-	-	-	-	+	++	+	++
PSD4	0	0	0	+	0	0	0	+	0	+	0	+
PSD5	+/-	+/-	0	-	+/-	+/-	+/-	-	0	+	0	+
PSD6	+	0	0	0	0	0	0	0	++	++	+	0
PSD7	+	+	+	+	+	+	+	++	+	++	+	0
CRE1	++	+	+	++	+	+	+	+	+	+	+	0
CRE2	++	+	0	+	0	0	0	0	0	0	0	0
HOU1	0	0	0	0	0	0	0	+	+	++	0	0
HOU2	0	0	0	0	0	0	0	0	+	++	0	0
HOU3	0	0	0	0	0	0	0	0	+	+	0	0
HOU4	0	-	0	-	0	-	0	0	-	+	+	0
HOU5	0	0	0	0	0	0	0	0	+	+	0	0
HOU6	+	0	0	+	0	0	0	0	0	+	0	0
HOU7	0	0	0	0	0	0	0	0	+	+	+	0
HOU8	0	0	0	+/-	0	0	0	0	+	+	0	+
HOU9	0	0	0	+/-	0	0	0	0	0	+	0	0
HOU10	0	0	0	0	0	0	0	+	0	+	0	0
HOU11	0	0	0	0	0	0	0	+	0	0	0	0
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++
EMP2	0	0	0	+	0	0	0	0	0	0	0	+
EMP3	0	0	0	+	0	0	+	0	0	0	+	+
RET1	0	0	0	0	0	0	0	+	+	+	+	++
RET2	0	0	0	0	0	0	+	+	0	0	0	0
RET3	0	0	0	0	0	0	0	0	+	0	0	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RET4	+	-	0	+	0	0	-	+	0	+	+	+
RET5	+	+	+	0	+	0	0	+	+	0	++	+
IN1	+	0	+	+	+	+	+	0	+	+	+	0
IN2	+	+	0	0	0	+	0	+	+	+	++	+
IN3	+	+	0	0	0	0	0	0	+	0	+	0
IN4	0	0	0	0	0	0	0	0	+	0	+	0
IN5	0	0	0	+	0	0	0	0	0	+	0	0
IN6	+	+	0	0	0	0	0	0	0	0	0	+
IN7	+	0	+	0	+	+	0	0	+	0	0	0
SE1	+	+	+	0	0	+	0	+	+	+	+	0
SE2	0	0	+	+	0	+	0	0	+	0	0	0
SE3	+	0	0	0	++	+	0	0	0	0	0	0
SE4	+	0	+	0	+	+	0	0	0	0	0	0
SE5	0	0	+	0	0	+	0	0	+	0	0	0
SE6	0	0	+	0	0	0	0	+	++	+	0	0
SE7	+	+	++	0	+	0	0	0	+	0	0	0
SE8	+	+	++	+	+	+	0	0	+	0	0	0
SE9	0	0	0	0	0	0	++	+	0	0	0	+
SE10	+	0	+	0	+	+	+	++	+	0	0	0
SE11	+	+	++	+	+	+	0	+	+	0	0	0
SE12	0	0	0	0	0	0	0	+	+	0	0	0
SE13	+	0	0	++	0	0	0	0	0	0	0	+
SE14	+	+	++	+	++	+	0	+	+	0	+	0
RUR1	0	0	0	+	0	0	+	+	+	0	0	++
RUR2	0	0	0	+/-	0	0	+	+	0	+	0	+
RUR3	0	0	0	+/-	0	0	+	+	0	0	0	0
RUR4	0	0	0	+/-	0	0	+	+	0	0	0	0
RUR5	0	0	0	+	0	0	+	+	0	0	0	0
SA1	+	+	++	+	++	++	+	+	+	++	+	0

G.2 Vision and Objectives

G.2.1 Vision for the Borough

Vision for the Borough

By 2040, the Borough will have delivered sustainable new homes and jobs meeting local needs and providing more opportunities for people to enjoy quality of life. We will have delivered or be on the journey to delivering a sub-regional exemplar business park at Junction 16 of the M6 Motorway to support sustainable economic growth and take advantage of the accessibility of the Borough to the wider strategic transport network. High quality and well-designed places and spaces will support healthy, safe and connected lifestyles.

We will have supported the growth of businesses, town centres and our University, whilst preserving and enhancing our natural and historic environment and reducing our carbon footprint. Residents will have access to training, education and a wide range of work opportunities.

We will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas with a particular focus on broadening our network of Neighbourhood Plans.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
Vision	+/-	+/-	+	+	+	+	+	++	+	++	+/-	++

- G.2.1.1 The proposed Vision for Newcastle-under-Lyme Borough sets out the Council's aspirations for conserving and enhancing important aspects of the borough's built and natural environment, whilst seeking to meet local needs in terms of housing, the economy and infrastructure.
- G.2.1.2 By striving to provide sustainable new homes and jobs to meet locally identified needs, increasing equal opportunities and supporting the growth of businesses and centres, a major positive impact on equality and the economy could be achieved (SA Objectives 10 and 12).
- G.2.1.3 The vision aims to create well-designed places and spaces that will facilitate active modes of travel and potentially provide access to open spaces, supporting the overall health and wellbeing of residents, a minor positive impact could be achieved (SA Objective 9).
- G.2.1.4 Preserving and enhancing Newcastle's natural, built and historic assets, whilst ensuring that new development respects and improves the character and distinctiveness of the borough, will be likely to result in a major positive impact on landscape (SA Objective 8). Cultural heritage is also likely to benefit from this preservation and enhancement of the historic environment through improvements to local character and distinctiveness; consequently, a minor positive impact is identified for SA Objective 7. The aspirations for preserving and enhancing the natural environment are also expected to lead to benefits for biodiversity, the conservation of soil and water resources, and green infrastructure, with minor positive impacts identified across SA Objectives 3, 4, 5 and 6.

- G.2.1.5 Although the Vision sets out the general aim for a reduction in carbon footprint, the potential impact on climate change (SA Objective 1) and air (SA Objective 2) cannot be determined owing to the lack of clarity regarding how the carbon footprint reduction and air quality improvement measures are going to be addressed in the Local Plan. Similarly, the impact on transport and accessibility (SA Objective 10) is uncertain. Wording to showcase potential positive intentions on these aspects could be incorporated in the Vision, although it is acknowledged that these points are addressed in greater depth within the strategic objectives as set out in **section G.2.2**.
- G.2.1.6 It is also recommended that wording to “*conserve and enhance*” is used with regard to cultural heritage, reflecting the wording in the National Planning Policy Framework (NPPF).

G.2.2 Strategic Objectives

Strategic Objectives

SO-1 (I) Create development with a sense of place and character, which naturally enhances human health and well-being through utilising sustainable construction methods, facilitating healthy lifestyle choices and supporting sustainable transport connections.

SO-2 (II) Diversify the Borough’s employment base and deliver employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, supporting technology and the green economy to generate more skilled jobs for local people.

SO-3 (III) Further investment in the regeneration and renewal of the distinctive market towns of Newcastle-under-Lyme and Kidsgrove to promote attractive public spaces, improvement and enhancement of the streetscape, independent stores, great restaurants, bars and cafes, a higher mix of residential and more alternative uses which draw in visitors and create safe vibrant centres. To support visitors and residents with access to healthier food choices and accessible, sustainable green spaces and active travel options to support health and wellbeing.

SO-4 (IV) Reduce the Borough’s carbon footprint and mitigate the impact of climate change in the Borough ensuring local policies promote sustainability and harness opportunities for renewable energy generation, carbon sequestration, and greener construction.

SO-5 (V) Provide a mix of housing types which are attractive to people who want to live and work in the Borough and to provide aspirational housing which is well designed, safe, secure and adaptable.

SO-6 (VI) Support the vitality of rural villages, preserving and enhancing the special character which is valuable to each local community whilst enabling sustainable growth to improve affordability and to provide choice in housing types for local people.

SO-7 (VII) Support and enable active and sustainable travel across the Borough with connections between our towns and villages. This will include raising the profile and improving the facilities of Kidsgrove Railway Station and improving connectivity as a significant sustainable transport hub in the Borough.

SO-8 (VIII) Provide a clear local strategic planning framework to support the development of Neighbourhood Plans which will set out the more detailed policies to guide development in the Borough.

SO-9 (IX) Support physical activity, including sport and recreation. Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages, one of the Borough’s greatest unique assets to help enhance health and wellbeing. To support waterways, as a significant blue and green infrastructure in the Borough.

SO-10 (X) Enable the growth of Keele University to support its vision for increasing student numbers and expanding its capacity for research and development; supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area.

SO-11 (XI) Deliver targeted development seeking a balance between growth and conservation to ensure that the Borough retains its identity as both an urban and rural Borough which provides the ideal setting for people wanting to enjoy countryside, village and town life in the West Midlands. To provide targeted infrastructure improvements which are resilient and adaptable to support sustainable development in our towns and villages.

SO-12 (XII) Protect the Green Belt, except where exceptional circumstances justify strategic Green Belt release to meet strategic needs identified by the Plan.

Strategic Objectives

SO-13 (XX) Protect and enhance the historic environment of our Borough.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
Objectives	++	+	+	+	+	+	+	++	++	++	++	++

- G.2.2.1 The Council have proposed a set of 13 strategic objectives which the emerging Local Plan will seek to meet, in order to deliver the Vision for the future of Newcastle-under-Lyme Borough.
- G.2.2.2 SO-I promotes place-making, seeking to ensure that new development is distinctive and well-connected. SO-III promotes the development of attractive and vibrant public spaces within the main towns of Newcastle-under-Lyme and Kidsgrove, supporting a mix of land uses and encouraging higher footfall, with likely benefits to the economy in addition to the townscape character. Furthermore, SO-VI seeks to conserve and enhance the special character and vitality of the borough's rural villages. SO-XII sets out the intention to protect the Green Belt from inappropriate development, ensuring that any release of Green Belt land is justified to meet the identified strategic needs of the borough. Together, these Strategic Objectives will set out a strong framework for the conservation and enhancement of the landscape, with a major positive impact identified under SA Objective 8.
- G.2.2.3 SO-XX focuses on the protection and enhancement of the borough's historic assets. SO-I and SO-VI focus on conserving and enhancing the character of the borough's towns and villages. A minor positive impact on cultural heritage (SA Objective 7) is identified.
- G.2.2.4 SO-II focuses on the economy, seeking to support economic growth and innovation with particular reference to supporting the green economy and creating more jobs. SO-X sets out the Council's support for growth and innovation of higher education in the borough at Keele University, with a likely positive effect on access to educational opportunities and development of a skilled workforce (SA Objective 10), in addition to economic benefits. A major positive impact on SA Objective 12 is therefore identified.
- G.2.2.5 SO-IV emphasises the Council's commitment to reducing the borough's carbon footprint, ensuring opportunities are sought for mitigating the effects of climate change including use of renewable energy, sustainable construction techniques and carbon sequestration. A major positive impact on climate change could be achieved (SA Objective 1).
- G.2.2.6 SO-V aims to ensure an appropriate mix of high-quality housing is delivered through the Local Plan, taking into consideration the needs and desires of the local population. SO-VI also seeks to ensure a good choice of housing types are provided including affordable homes. A major positive impact on equality is identified (SA Objective 10).
- G.2.2.7 SO-VII focuses on transport, aiming to support active travel (alongside SO-III) and a range of sustainable transport methods including improved connections to Kidsgrove Town

- Centre, including the railway station. By seeking to improve sustainable transport connections across the borough, a major positive impact on transport and accessibility could be achieved (SA Objective 11). Improved sustainable transport uptake could also lead to a secondary minor positive effect on air quality (SA Objective 2).
- G.2.2.8 Alongside SO-VII's support for active travel improvements, SO-IX seeks to encourage more active lifestyles for local residents through maintaining open spaces and green links, and providing opportunities for sports and recreation. SO-III also aims to improve the health of town centres including through offering healthier food options. SO-I seeks to facilitate healthy lifestyle choices through delivering well-connected places. These measures will be likely to support healthier living and encourage outdoor exercise, with potential for a major positive impact on human health and wellbeing (SA Objective 9).
- G.2.2.9 Conserving and enhancing green corridors, waterways, and blue and green infrastructure, as outlined under SO-IX, could potentially lead to multi-functional benefits beyond health and wellbeing, including for biodiversity, soil and water resources, air quality, flooding and adaptation to climate change. SO-XI strives to balance growth with conservation of the borough's natural and built assets, recognising the strong urban and rural aspects of Newcastle-under-Lyme which characterise the borough. However, the proposed strategic objectives do not explicitly refer to these aspects. Based on the current wording, a minor positive impact has been identified for SA Objectives 3, 4, 5 and 6. It is recommended that the strategic objectives should clearly set out the Council's intention to conserve and enhance the quality and extent of green and blue infrastructure in the borough, and recognise the multi-functional benefits of doing so, encouraging development proposals to pursue nature-based solutions where possible.
- G.2.2.10 SO-VIII refers to the preparation of Neighbourhood Plans to guide development at the local level via a suite of detailed development management policies. This objective will be likely to benefit a range of SA Objectives.

G.3 Planning for Sustainable Development

G.3.1 Policy PSD1: Overall Development Strategy

Policy PSD1: Overall Development Strategy

1. A minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 400 dwellings per annum.
2. Provision will be made for a minimum of 63 hectares of employment land over the Plan period 2020-2040.
3. The Council will make sufficient provision for housing, employment and other uses by supporting the development of sites allocated in the Local Plan and as identified on the Policies Map. This will include the allocation of two strategic employment sites that will be allocated in the Plan to support a resilient supply of employment land and investment and growth, including serving the wider sub-regional economy:-
 - a) Land at Junction 16 of the M6 to support a sub-regional logistics focused employment development.
 - b) Land adjacent to Keele University to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of the University.
4. The Council will encourage the efficient use of land through windfall development, including the redevelopment / re-use of previously developed land and buildings, where the development:-
 - a) Considers the landscape / townscape character of the existing surroundings when determining the character and density of development;
 - b) supports the creation of high quality; beautiful and sustainable buildings and places;
 - c) Is physically well-related to existing settlements, infrastructure and sustainable transport modes; and
 - d) Does not require major investment in new infrastructure. Where this is unavoidable, the delivery of development should be co-ordinated (including the use of phasing) to coincide with new infrastructure provision.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD1	--	-	-	-	+/-	-	+/-	+/-	-	++	+/-	++

G.3.1.1 Policy PSD1 sets out the Council's overall approach to the development strategy for the Plan period to 2040 including the proposed level of housing and employment growth to be delivered through the emerging Local Plan.

G.3.1.2 It should be noted that the preferred sites for allocation, including for residential, employment or mixed uses, have been assessed individually as part of the reasonable alternative site assessments (see **Appendix H**). The evaluation of site allocation policies, including the two proposed strategic employment sites AB2 and KL15, is presented in **Appendix J**.

G.3.1.3 Policy PSD1 seeks to deliver a minimum of 8,000 dwellings (400 dwellings per annum) which will be expected to meet the local need as identified in the Housing and Economic

(Development) Needs Assessment (HEDNA)¹; therefore, the policy will be expected to result in a major positive impact on housing provision (SA Objective 10).

- G.3.1.4 Through delivering a minimum of 63ha of employment land, this will be expected to meet the upper end of the identified local need according to the HEDNA, leading to a major positive impact on the economy and employment opportunities (SA Objective 12). Evidence included in the HEDNA indicates that the level of housing growth proposed in Policy PSD1 is aligned with the anticipated level of jobs growth.
- G.3.1.5 The total carbon emission estimates across Newcastle-under-Lyme for 2021 indicate a total of 701,380 tonnes of CO₂, with an average per capita emission of 5.7 tonnes, of which 550,679 tonnes (4.5 tonnes per capita) is considered to be within the scope of influence of the local authority²³. The policy aims to incorporate the development of sustainable buildings and well-designed space; despite this, the construction and occupation of new dwellings, employment sites and supporting infrastructure will be expected to increase CO₂ and other GHG emissions to some extent, including via emissions associated with increased energy consumption and traffic. Overall, a major negative impact on climate change will be anticipated as a result of the proposed development (SA Objective 1).
- G.3.1.6 The proposed development of 8,000 dwellings over the Plan period could lead to an increase in the local population by approximately 16,800 residents, based on an average of 2.1 people per dwelling⁴. Such an increase will be expected to place increased pressure on the borough's infrastructure, and lead to increased traffic. This may lead to the exacerbation of existing congestion issues with implications for air quality and health, particularly in the context of the three existing Air Quality Management Areas (AQMA) within the borough and the adjacent Stoke-on-Trent AQMA. Policy PSD1 will support development that is located in areas with good accessibility in regard to infrastructure and sustainable transport, therefore potentially reducing private car use and facilitating active travel; improving accessibility to infrastructure and sustainable transport is likely to have benefits for health and potentially reducing congestion to a certain extent. However, the spatial strategy is also reliant on two large strategic employment sites at the M6 Junction 16 and Keele University to meet the identified employment needs which may involve significant amounts of road-based travel depending on the specific uses and extent of public transport connections. Overall, a minor negative impact is identified for air and

¹ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

² Department for Business, Energy and Industrial Strategy (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics> [Date accessed: 30/05/24]

³ CO₂ emissions estimates within the scope of influence of Local Authorities refers to subset dataset (excludes large industrial sites, railways, motorways and land-use).

⁴ Calculated based on the dwelling stock (57,657) derived from DLUHC & MHLG (2021) Live tables on dwelling stock (including vacants). Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> and population (123,300) derived from ONS (2021) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> [Date accessed: 30/05/24]

- health (SA Objectives 2 and 9) and mixed effects, recorded as uncertain, are likely for transport (SA Objective 11).
- G.3.1.7 The large scale of development proposed has the potential to lead to adverse impacts on biodiversity, flora and fauna due to increased development related threats and pressures on both designated and non-designated biodiversity assets, including through reductions in air quality and water quality/quantity, habitat fragmentation and recreational pressures on wildlife sites. Despite biodiversity net gain (BNG) provisions at the site level, there is potential for a cumulative minor negative effect on biodiversity (SA Objective 3) at the landscape scale.
- G.3.1.8 Due to the large scale of development proposed under this policy, it is likely that there will be an associated significant loss of previously undeveloped land. However, the policy outlines the aim to utilise previously developed land where possible, protecting valuable ecological and agriculturally important soils. On balance, due to the large scale of development a large proportion of undeveloped land is likely to be lost, a minor negative impact on natural resources is anticipated (SA Objective 4).
- G.3.1.9 The level of flood risk new developments are exposed to will depend on the specific location of the sites and any interventions or mitigation measures that can be put in place, as identified through site-specific Flood Risk Assessments where necessary. The construction of new dwellings can exacerbate flood risk owing to the introduction of hardstanding and impermeable surfaces, but implementation of adaptive technologies can mitigate for this depending on the site-specific circumstances. The overall effect of Policy PSD1 on flooding (SA Objective 5) is uncertain.
- G.3.1.10 New development has the potential to increase runoff during both construction and occupation of dwellings, which would potentially lead to adverse effects on the quality of above and below-ground watercourses. The findings of the latest Water Cycle Study and relevant Water Resources Management Plans should be carefully considered in regard to capacity constraints or upgrades that might be necessary to facilitate development whilst minimising risks to water quality. At this stage, a minor negative impact is identified.
- G.3.1.11 Policy PSD1 supports the creation of “*high quality, beautiful and sustainable buildings and places*” which will be likely to result in benefits to the appearance and character of the local area. However, the proposed spatial strategy will also involve a significant amount of growth in currently undeveloped locations, where there is potential for the introduction of new development to alter the landscape character and local distinctiveness. The overall impact on landscape is likely to be mixed across the Plan area, with an uncertain impact recorded overall for SA Objective 8. There is similar uncertainty regarding the overall effect of the proposed development under Policy PSD1 on cultural heritage (SA Objective 7). New development in close proximity to cultural heritage features has the potential to adversely affect their setting, especially in a rural context; however, new development can also stimulate new investment and potentially enhance the local townscapes or improve the accessibility and appreciation of heritage assets.

G.3.2 Policy PSD2: Settlement Hierarchy

Policy PSD2: Settlement Hierarchy

1) Strategic Centre

The town of Newcastle-under-Lyme is the key strategic centre of the Borough containing the largest range of services and facilities, retail, sport and leisure, economic and residential areas, sustainable transport connections and accessible public open space. This centre represents the most sustainable location for growth and therefore is a focus in this Plan for new development. Newcastle-under-Lyme Town Centre is the primary focus for uses which attract large numbers of people such as major cultural, tourist, social and community venues; and the primary focus for large scale retail, leisure and office development. Development proposals should maximise the use of existing resources and infrastructure to allow jobs, homes and other facilities to be located close to each other and be accessible by public transport. Development proposals should recognise the distinct character of individual areas within the town.

2) Urban Centre

Kidsgrove is an urban centre in the Borough and incorporates Talke and Butt Lane. The centre performs a secondary, but complementary role to Newcastle-under-Lyme as a strategic centre, providing a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. Kidsgrove Town Centre is also an appropriate location for uses which attract large numbers of people such as cultural, tourist, social and community venues; as well as retail, leisure and office development. It is a key location for growth. Development should be of a scale, location and nature that recognises the distinctiveness of Kidsgrove to maintain its vitality and viability. Development which supports the viability of Kidsgrove Railway Station and helps to improve connectivity and the linkages between the town centre and rail station will be encouraged where it contributes to an attractive public realm.

3) Rural Centres

Rural Centres provide a role in service provision to the local population and contain several essential services and facilities in order to meet the day to day needs of residents. The Rural Centres will meet some of the development needs of the Borough, commensurate with their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character. It is recognised that there are differences between these villages in terms of their sizes and available facilities and therefore the scale of development in each area should be relative to its role, function and infrastructure capacity. The Rural Centres are Audley and Bignall End (joint), Baldwins Gate, Betley and Wrinehill (joint), Keele Village (with University Hub), Loggerheads, Madeley and Madeley Heath (joint). The University Hub is expected to receive a level of growth commensurate with its role as a strategic hub whilst recognising its rural role and function.

4) Other Settlements and Rural Areas

These areas comprise smaller settlements, the open countryside and areas of Green Belt where development is restricted. The rural economy is a key asset of the Borough and will have grown stronger through the Plan period, based primarily on agriculture but supplemented by appropriate rural diversification, where justified. Areas of landscape value, sites of nature conservation importance and heritage assets and their settings will have been maintained and where possible enhanced.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD2	+	-	-	-	-	-	-	-	+	++	+	++

G.3.2.1 Policy PSD2 sets out the hierarchy of settlements within Newcastle-under-Lyme, based on the level and capacity of services and facilities they contain, and consequently the types and level of development that will be appropriate in each.

G.3.2.2 Under this policy, development will be directed in the first instance towards the town of Newcastle-under-Lyme which forms the 'strategic centre' for the borough, followed by the town of Kidsgrove as the 'urban centre', and with a smaller proportion of development

- directed towards the 'rural centres': Audley and Bignall End; Baldwins Gate; Betley and Wrinehill; Keele Village (with University Hub); Loggerheads; and Madeley and Madeley Heath. Elsewhere in the more rural countryside areas of the borough, Policy PSD2 seeks to restrict development other than certain uses such as rural diversification.
- G.3.2.3 Policy PSD2 seeks to direct the majority of new development towards the towns of Newcastle-under-Lyme and Kidsgrove, which represent the most sustainable locations in terms of access to the greatest range of services, jobs and transport connections. As such, the policy could lead to benefits in terms of access for new residents to sustainable transport options and reduce the need to travel to reach services to meet day-to-day needs. The focus of development around these towns could also encourage new residents to make more local journeys on foot and reduce reliance on private car use. On balance, the proposed distribution of development could potentially lead to a minor positive impact on climate change (SA Objective 1) and transport and accessibility (SA Objective 11).
- G.3.2.4 By seeking to direct housing development in accordance with the provision of and accessibility to key services, including jobs, schools and local shops, it is likely that the policy will lead to a major positive impact on equality (SA Objective 10) in terms of delivering sustainable and cohesive communities. It is also likely that the policy will help to ensure most new residents are located in areas with good access to existing healthcare facilities including GP surgeries, as well as sports and leisure facilities and accessible public open spaces as referred to in the policy text. This policy also aims to protect the open countryside from inappropriate development. Overall, the policy will be likely to ensure residents have good access to a range of open spaces and natural habitats, with a minor positive impact on physical and mental health and wellbeing (SA Objective 9).
- G.3.2.5 However, an increase in the population within the urban areas of the borough will be expected to result in an increased number of vehicles on the road network, to some extent, and consequently this could lead to an exacerbation of local congestion issues, with adverse implications for local air quality. Three AQMAs have been declared in the borough, three of which are located in the main towns. Air pollution in higher density urban areas is more likely to result in adverse impacts on human health than air pollution in lower density areas, due to human activity in densely populated street canyon leading to higher air pollution levels, in-combination with taller buildings stagnating the air flow. By focusing development in existing urban areas, it is likely that current air quality issues will be exacerbated, and therefore, a minor negative impact on air pollution is expected (SA Objective 2).
- G.3.2.6 By directing most development towards existing urban areas, it is likely that there will be opportunities for development on brownfield sites, which will help limit the permanent and irreversible loss of agriculturally and ecologically valuable soils. Policy PSD2 states that "*development proposals should maximise the use of existing resources and infrastructure*". That being said, under this policy, the rural centres will meet some of the development needs of the borough and it is likely that much of this development will be situated on previously undeveloped land, in addition to some of the development on the outskirts / suburbs of the strategic and urban centres. Overall, a minor negative impact on natural resources is likely (SA Objective 4).

- G.3.2.7 Due to pressures on land for development, there could potentially be adverse effects on the local green infrastructure (GI) network. Higher density developments and the regeneration of vacant sites within the higher-tier settlements will be likely to help reduce the amount of land lost to development, and consequently help to reduce the overall vegetation cover lost to development. Nevertheless, new development within the borough will be likely to result in a loss of previously undeveloped land, and subsequently natural habitats and ecologically important soils. As a result, a minor negative impact on local biodiversity will be anticipated (SA Objective 3). A similar adverse impact could also extend to the borough's water resources (SA Objective 6).
- G.3.2.8 Furthermore, despite the likely opportunities for re-use of previously developed land, new development within both the urban and rural areas could potentially result in exacerbation of flood risk. The Lyme Brook which flows through Newcastle-under-Lyme Town represents one of the major sources of fluvial flood risk in the borough. Further growth within both the urban and rural areas will also be likely to put pressure on undeveloped land and associated GI, to some extent, which may lead to exacerbation of flood risk. Therefore, this policy could potentially have a minor negative impact on flooding (SA Objective 5).
- G.3.2.9 With regard to the urban centre, the policy states that "*development should be of a scale, location and nature that recognises the distinctiveness of Kidsgrove to maintain its vitality and viability*" and for the rural centres, the policy seeks to ensure that the "*type, density and design of development [seeks] to protect and enhance their rural and historic character*". The policy will therefore be likely to help ensure that new buildings are in-keeping with the existing local character of each area, and conserve and enhance the character of cultural heritage features.
- G.3.2.10 However, increasing development within the urban areas could potentially result in the need for higher densities to be pursued, which can often result in taller buildings. This could lead to a significant change to the townscape character and impact the surrounding countryside and sensitive landscape receptors. Building design is unknown at this stage of the plan-making process; therefore, a minor negative impact on the local landscape cannot be ruled out. With regard to the 'other settlements and rural areas' the policy states that "*areas of landscape value, sites of nature conservation importance and heritage assets and their settings will have been maintained and enhanced*". There are likely to be mixed effects on both landscape and cultural heritage, with an overall minor negative impact anticipated overall at this stage (SA Objectives 7 and 8).
- G.3.2.11 Newcastle-under-Lyme Town Centre is proposed to form the primary focus for large scale retail, leisure and office development. Under Policy PSD2, Kidsgrove Town Centre is also considered to be "*an appropriate location for uses which attract large numbers of people such as cultural, tourist, social and community venues; as well as retail, leisure and office development*". The policy also recognises the role of the rural economy within the borough, promoting rural diversification where appropriate. As such, the policy is likely to ensure a range of diverse sites and premises are available to meet current and potential future economic needs, in accordance with the scale and type of development appropriate within each of the defined centres. A major positive impact on the economy could be achieved (SA Objective 12).

G.3.3 Policy PSD3: Distribution of Development

Policy PSD3: Distribution of Development

- 1) The strategic centre of Newcastle-under-Lyme is expected to accommodate in the order of 5,200 new homes
- 2) The urban centre of Kidsgrove is expected to accommodate in the order of 800 new homes
- 3) The rural centres are expected to accommodate development of the scale shown below:
 - Audley and Bignall End (joint) in the order of 250 new homes
 - Betley and Wrinehill (joint) and Madeley and Madeley Heath (joint) in the order of 250 new homes
 - Loggerheads in the order of 450 new homes
 - Baldwins Gate in the order of 250 new homes
 - Keele and Keele University (joint) in the order of 800 new homes
- 4) The other settlements and rural areas tier of the settlement hierarchy will be expected to accommodate development in line with the policy approach set out in the Local Plan but is not a focus of growth through this policy.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD3	+	-	-	-	-	-	-	-	+	++	+	++

G.3.3.1 Policy PSD3 defines the approximate levels of growth that is expected within each settlement. The policy sets out the Council's intention to direct the highest level of growth to the strategic centre (Newcastle-under-Lyme), followed by the urban centre (Kidsgrove). Of the rural centres, Policy PSD3 guides the most development to Keele and Keele University, followed by Loggerheads, Audley/Bignall End, and Betley/Wrinehill, Madeley/Madeley Heath and Baldwins Gate.

G.3.3.2 As Policy PSD3 directs growth in line with the settlement hierarchy as set out in Policy PSD2, it is expected to perform the same against each of the SA Objectives.

G.3.4 Policy PSD4: Development Boundaries and the Open Countryside

Policy PSD4: Development Boundaries and the Open Countryside

1. Settlement boundaries for the Strategic Centre, Urban Centre and Rural Centres are defined on the Policies Map. Open countryside is defined as land outside these defined settlement boundaries.
2. Within settlement boundaries, development proposals will be supported where they are in keeping with the scale, role, and function of that settlement and do not conflict with any other relevant policy in the Local Plan.
3. In the open countryside, the following types of development will be supported:
 - a. Development of residential dwelling(s) where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside in line with Policy RUR2 Rural Workers Dwellings;
 - b. Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations;

Policy PSD4: Development Boundaries and the Open Countryside

- c. Development associated with the essential expansion or redevelopment of an existing business and / or that meet the criteria set out in Policy RUR1 Rural Economy;
 - d. Development associated with the conservation and enhancement of a heritage asset where this represents optimal viable use or would be appropriate enabling development to secure the future use of the heritage asset;
 - e. Limited extensions that would not adversely affect the form, scale, massing or proportion of that building in line with Policy RUR3 Extensions and Alterations to buildings Outside of Settlement Boundaries;
 - f. Re-use of existing buildings in line with Policy RUR5 Re-use of Rural Buildings for Residential Use;
 - g. Replacement buildings in line with Policy RUR4 Replacement Buildings Outside of Settlement Boundaries;
 - h. The infill of a small gap with one or two dwellings in an otherwise built-up frontage;
 - i. Proposals for Rural and First Homes Exception sites that meet the criteria set out in Policy HOU8 Rural and First Homes Exception Sites and policy HOU9 Community Led Exception Sites;
 - j. Proposals for Self-Build and Custom Dwellings that meet the criteria set out in Policy HOU6 Self Build and Custom Dwellings;
 - k. In the case of new dwellings which meet one of the exceptional circumstances for isolated homes in the countryside including exceptional design and / or sustainability as set out in the National Planning Policy Framework and have been through a formal design review process;
4. Development proposals should not harm the character, appearance and environmental quality of the Countryside as an asset that contributes to the Borough's identity, and that should be preserved.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD4	0	0	0	+	0	0	0	+	0	+	0	+

G.3.4.1 Policy PSD4 seeks to protect the open countryside of Newcastle-under-Lyme from inappropriate development, setting out the permitted uses outside of the defined development boundaries for the borough's centres.

G.3.4.2 Policy PSD4 encourages the redevelopment and re-use of previously developed land and seeks to restrict new development within the open countryside to specific circumstances. As such, the policy will help to protect existing soils and vegetation within the open countryside areas. The policy also supports the re-use of existing buildings, and is in line with the Policy RUR4 'Replacement Buildings Outside of Settlement Boundaries' in terms of the proportion and scale of any alterations. New dwellings will only be permitted in exceptional circumstances. Overall, this could help to promote an efficient use of land in these areas and minimise the loss of undeveloped land for new built form, potentially resulting in a minor positive impact on natural resources (SA Objective 4).

G.3.4.3 The policy supports development proposals associated with agricultural, forestry or essential farming operations, as well as expansion or redevelopment of existing businesses located in the countryside areas. Therefore, the policy could potentially have a minor positive impact on the rural economy (SA Objective 12).

G.3.4.4 Through supporting limited infill development, and proposals which demonstrate a contribution towards meeting locally identified needs for affordable housing and self-build plots, the policy could result in a minor positive impact on housing provision and equality (SA Objective 10).

G.3.4.5 The policy states that “*development proposals will be supported where they are in keeping with the scale, role, and function of that settlement*” and will help to ensure that the “*character, appearance and environmental quality*” of the countryside is not compromised by the development. The support for redevelopment of rural buildings may also help to improve the appearance of degraded buildings. A minor positive impact could be achieved in relation to the protection of landscape character, by ensuring that development is in-keeping with local distinctiveness and potentially improving the appearance in some locations (SA Objective 8).

G.3.5 Policy PSD5: Green Belt

Policy PSD5: Green Belt

1. The Green Belt boundary is defined on the Policies Map
2. The Plan will alter the Green Belt boundary only to:
 - a. Support the allocation of Green Belt sites listed in chapter 13 of this Plan
 - b. Establish an inset boundary at Keele
3. Within the Green Belt, planning permission will not be granted for inappropriate development, except in very special circumstances, in accordance with the approach set out in the National Planning Policy Framework.
4. New buildings within the Green Belt will be considered inappropriate unless they meet an exception listed in the National Planning Policy Framework.
5. Other forms of development may be considered appropriate in the Green Belt if they preserve its openness and align with the purposes of the Green Belt, as outlined in the National Planning Policy Framework.
6. Development proposals for sites removed from the Green Belt should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt Land to offset the impact of the removal of land from the Green Belt. These improvements should demonstrably enhance environmental quality, biodiversity and accessibility.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD5	+/-	+/-	0	-	+/-	+/-	+/-	-	0	+	0	+

G.3.5.1 Policy PSD5 sets out the general presumption against new development within Green Belt areas, unless specific circumstances can be demonstrated, in line with the NPPF. In Newcastle-under-Lyme, the Green Belt covers the northern half of the borough and surrounds Stoke-on-Trent.

G.3.5.2 The principal objectives of Green Belt designation are to maintain openness and to restrict urban sprawl. Green Belt is not a reflection of the environmental quality or value of the land. The NPPF sets out the five purposes of the Green Belt as follows:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict or other urban land.

G.3.5.3 Policy PSD5 also supports the allocation of certain Green Belt sites through the Local Plan, leading to a likely minor positive impact on housing and employment provision (SA Objectives 10 and 12). It should be noted that the preferred sites for allocation, for residential, employment or mixed uses, including those situated within the Green Belt, have been assessed individually as part of the reasonable alternative site assessments (see **Appendix H**). The evaluation of site allocation policies, including for those located within the Green Belt, is presented in **Appendix J**. The assessment of sites has identified a range of sustainability impacts in regard to various SA Objectives depending on the specific locations; therefore, there is some uncertainty regarding the overall sustainability effects of the implementation of this policy.

G.3.5.4 By protecting the retained Green Belt, the policy is likely to help maintain its openness and permanence, which will serve to prevent coalescence between settlements and help to prevent inappropriate development, such as large-scale residential development, in these locations. As such, Policy PSD5 has the potential to positively affect the landscape character in these locations. In light of the Green Belt's role in preserving the setting and special character of historic towns, there could also be some degree of benefit to cultural heritage for the retained Green Belt areas although the overall effect on SA Objective 7 is uncertain and will depend upon the specific location of development and the setting / significance of heritage assets in the vicinity.

G.3.5.5 By undertaking a Green Belt review and releasing Green Belt land only to facilitate planned growth, the policy has the potential to facilitate more sustainable communities, by locating new development in closer proximity to services and facilities i.e. on the edge of existing settlements, and outside of existing areas of poor air quality. However, growth within the Green Belt may also lead to new development being located further from the existing centres where the majority of public transport infrastructure is located, and may lead to a reduction in air quality in these areas especially if new residents are travelling into centres for work or school. The overall effect on climate change (SA Objective 1) and air quality (SA Objective 2) is uncertain.

G.3.5.6 Although the policy seeks to restrict development in the Green Belt except in specific circumstances, the policy also supports the allocation of some Green Belt sites through the Local Plan. As such, a loss of soil resource is expected with an associated minor negative impact on SA Objective 4.

G.3.5.7 Policy PSD5 requires development proposals for release of sites from the Green Belt to include "*compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of the removal of land from the Green Belt*". Planning Practice Guidance (PPG) suggests that such compensatory improvements should

be informed by supporting evidence with regard to landscape, biodiversity and recreational enhancements, potentially including⁵:

- *"new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision".*

G.3.5.8 Therefore, the policy could potentially help to reduce the likelihood of adverse effects on accessibility to the countryside and opportunities for recreation (SA Objectives 9 and 11). Furthermore, the compensatory improvements may help to avoid significant adverse effects (but potentially still lead to some localised adverse effects) on the quality and character of the landscape (SA Objective 8), and could potentially provide opportunities to deliver or contribute towards the emerging Nature Recovery Network⁶ and/or GI network⁷. There may also be potential for longer-term positive effects on biodiversity (SA Objective 3) if the delivery of the Nature Recovery Network incorporating measurable net gains in biodiversity is successful, although a negligible impact is identified at this stage.

G.3.5.9 The overall effect on water quantity and quality, as well as flood risk, is uncertain as it would be dependent upon the site-specific circumstances and location of development. The associated compensatory GI enhancements may lead to benefits in this regard, although new development could potentially lead to increased runoff of pollutants (especially if new development will introduce new hardstanding and built development on currently undeveloped land).

G.3.6 Policy PSD6: Health and Wellbeing

Policy PSD6: Health and Wellbeing

1. The Council will support development that fosters safe, healthy and active lifestyles. Any new development should:-
 - a. Follow Sport England's Active Design Principles (as updated);
 - b. Encourage healthy lifestyles and environments to tackle health inequalities;
 - c. For major development schemes, including non-residential, be supported by a core (i.e screening) health impact assessment. Following the screening assessment, a full (comprehensive) health

⁵ DLUHC and MHCLG (2019) Planning practice guidance Paragraph: 002 Reference ID: 64-002-20190722. How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements? Available at: <https://www.gov.uk/guidance/green-belt> [Date accessed: 10/05/24]

⁶ Staffordshire Wildlife Trust (2020) South Staffordshire District Nature Recovery Network Mapping. Available at: www.sstaffs.gov.uk/sites/default/files/2023-03/biodiversity_network_recovery_mapping_2020.pdf [Date accessed: 10/05/24]

⁷ RSK (2022) Newcastle-under-Lyme Borough Council Open Space and Green Infrastructure Strategy: Final report, April 2022. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/480/open-space-and-green-infrastructure-strategy> [Date accessed: 10/05/24]

Policy PSD6: Health and Wellbeing

impact assessment may be required. Development that would have an unacceptable adverse impact, following the Health Impact Assessment, on health or wellbeing will not be permitted;

- d. For housing developments, provide opportunities for healthy living and maintained independence and promote mental wellbeing through the encouragement of safe and accessible walking and cycling, access to services, and well-designed housing (as outlined in Policy PSD7) to support a reduction in social isolation and the creation of inclusive communities;
- e. Support walking, cycling and wheeling transport choices
- f. Provides access to accessible sports facilities green spaces and opportunity for recreation and leisure that is available and affordable for all ages and abilities;
- g. Support schemes that encourage life-long learning, community development and skills training;
- h. Support initiatives that seek to reduce overweight and obesity across the Borough, including for schemes such as Hot Food Takeaways (outlined in policy RET4)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD6	+	0	0	0	0	0	0	0	++	++	+	0

- G.3.6.1 Policy PSD6 promotes health and wellbeing, setting out the Council's intention to support healthy and active lifestyles, provide for good accessibility to services, and address health inequalities in the borough.
- G.3.6.2 In line with the Staffordshire Joint Wellbeing Strategy⁸, the policy aims to address the four priorities for health in the county: health in early life; good mental health; healthy ageing; and healthy weight. The policy supports initiatives to tackle obesity, including childhood obesity, by restricting the number, location and opening times of fast-food takeaways.
- G.3.6.3 Policy PSD6 requires a Health Impact Assessment (HIA) to be prepared alongside all major development proposals, which is defined as 10 or more homes or an area of 0.5ha or more (residential), and over 1ha (non-residential). This is likely to ensure potential adverse effects of development on human health and health inequalities are identified and addressed.
- G.3.6.4 Furthermore, Policy PSD6 seeks to ensure that development proposals provide good access, including via active travel, to sports and recreation facilities as well as other local services, and that the loss of existing open spaces is avoided. Policy PSD6 is likely to encourage active lifestyles and increase the uptake of cycling and walking, through the provision of safe and accessible routes. As such, the policy is likely to result in a minor positive impact on transport and accessibility (SA Objective 11), with a potential secondary benefit in terms of climate change due to the reduced need to travel, in particular by private car (SA Objective 1).

⁸ Staffordshire Health and Wellbeing Board (2022) Staffordshire Joint Health and Wellbeing Strategy 2022-2027. Available at: <https://moderngov.staffordshire.gov.uk/mgConvert2PDF.aspx?ID=161842> [Date accessed: 30/05/24]

- G.3.6.5 Through promoting accessible services and active travel connections, the policy will also be likely to contribute towards the development of sustainable communities which facilitate social interaction. The policy sets out further support for “*schemes that encourage life-long learning and skills training*”, with likely benefits in terms of increasing equality of opportunities including adult education.
- G.3.6.6 Overall, Policy PSD6 is likely to result in a major positive impact on health and wellbeing, and equality (SA Objectives 9 and 10).

G.3.7 Policy PSD7: Design

Policy PSD7: Design

- 1) Developments proposals should accord with the National Design Code, National Design Guidance and any adopted local design guide or code.
- 2) Developments should contribute positively to an area’s character and identity, creating or reinforcing local distinctiveness and sense of place in terms of:-
 - a. Height, scale, form and grouping;
 - b. Choice of materials;
 - c. External design features;
 - d. Massing of development;
 - e. Green infrastructure; and
 - f. Relationship to neighbouring properties, street scene and the wider neighbourhood
- 3) The Council will take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites;
- 4) Development proposals for major development schemes should demonstrate that design proposals have positively responded to the Design Review process;
- 5) Development proposals should ensure that housing developments achieve Building for a Healthy Life standard (or as updated);
- 6) Developments should ensure high levels of passive surveillance of streets, spaces and parking, including appropriate lighting, and making sure that the site layout and design minimises opportunities for crime, anti-social behaviour, and minimises the fear of crime. Design should incorporate the Secured by Design Principles;
- 7) Developments should create high quality, beautiful and sustainable buildings and places, avoiding generic design solutions where they do not establish or maintain a strong sense of quality and place;
- 8) Developments should be accessible and inclusive, ensuring that they can be used safely, easily and with dignity by all, regardless of disability, age, gender, ethnicity or economic circumstances.
- 9) Development should take account of Department for Transport Local Transport Note 1/20 as updated and Local Walking and Cycling Plans in scheme design.
- 10) Developments should ensure that new streets are tree lined and that opportunities are taken to incorporate tree planting elsewhere in the development.
- 11) Within those areas characterised by large houses on extensive plots, as identified in the Landscape and Character Assessment Study (2022) development proposals should be sensitive to the existing patterns of development

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
PSD7	+	+	+	+	+	+	+	++	+	++	+	0

- G.3.7.1 Policy PSD7 guides the design of new developments, ensuring that schemes are in accordance with the National Design Code as well as any local design codes or guidance.
- G.3.7.2 Effective design codes can help to ensure new developments are integrated into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.
- G.3.7.3 The policy aims to ensure that development proposals “*create high quality, beautiful and sustainable buildings and places*” and achieve the standards as set out in the Building for a Healthy Life (BHL) design toolkit⁹. BHL includes 12 key considerations:
- Integrated neighbourhoods:
 - Natural connections;
 - Walking, cycling and public transport;
 - Facilities and services; and
 - Homes for everyone.
 - Distinctive places:
 - Making the most of what’s there;
 - A memorable character;
 - Well defined streets and spaces; and
 - Easy to find your way.
 - Streets for all:
 - Healthy streets;
 - Cycle and car parking;
 - Green and blue infrastructure; and
 - Back of pavement, front of home.
- G.3.7.4 The measures set out in the policy are likely to help ensure that future development does not adversely affect the existing landscape character and where appropriate, results in visual enhancements to the area. The policy seeks to ensure design considerations reinforce local distinctiveness, with regard to building materials, massing, layout and design of new developments. Overall, a major positive impact on the local landscape is expected (SA Objective 8). A minor positive impact could potentially extend to cultural heritage (SA Objective 7) as new development is expected to conserve and possibly enhance the local character including that of heritage assets and the historic environment.
- G.3.7.5 In line with the BHL considerations, Policy PSD7 is likely to ensure the provision of high-quality neighbourhoods which are well connected via active travel routes and integrate open spaces and green/blue infrastructure. The policy is expected to result in a minor positive impact on health and accessibility (SA Objectives 9 and 11).
- G.3.7.6 Furthermore, improved provision and connectivity of green/blue infrastructure will be likely to contribute towards climate change resilience. Green/blue infrastructure can provide

⁹ Birkbeck, D., Kruczkowski, S. with Jones, P., McGlynn, S. and Singleton, D. (2021) Building for a Healthy Life: A Design Toolkit for neighbourhoods, streets, homes and public spaces. Available at: https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf [Date accessed: 10/05/24]

several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), improve the filtration of air pollutants if designed carefully, and the protection of soil resources from erosion. It may also serve to retain and improve habitats and ecological corridors amongst built development. This policy could potentially result in a minor positive impact on climate change, air quality, biodiversity, natural resources, flooding and water quality (SA Objectives 1, 2, 3, 4, 5 and 6).

- G.3.7.7 The policy seeks to ensure that developments are accessible and inclusive for all, including for people with disabilities or other specialist requirements, ensuring that developments are appropriate “*regardless of disability, age, gender, ethnicity or economic circumstances*”. The policy further encourages developments to seek opportunities to integrate natural surveillance through design and layout and consider appropriate lighting, which will be likely to help reduce crime and the fear of crime. Therefore, the policy is expected to have a major positive impact on equality and the provision of housing to meet the needs of the local communities (SA Objective 10).

G.4 Climate and Renewable Energy

G.4.1 Policy CRE1: Climate Change

Policy CRE1: Climate Change

- 1) The Council expects development to follow the energy and heat hierarchy.
- 2) Non-domestic developments should be designed to meet the BREEAM 'Excellent Standard', including in respect of water efficiency, unless demonstrated as not feasible or viable. Where the 'Excellent Standard' cannot be achieved, evidence must be submitted to demonstrate why the standard cannot be complied with. The BREEAM 'very good' standard must be met as a minimum. Proposals should aim to achieve BREEAM Outstanding Standard (as updated) and will be afforded positive weight where this is achieved.
- 3) All residential development proposals should seek to reduce the use of mains water through adoption of water saving measures, fittings and appliances. Residential developments should be designed to achieve a maximum of 110 litres per person per day, in line with the optional standard of Building Regulations, Part G.
- 4) To ensure a high standard of fabric and energy efficiency performance, all new residential development will be expected to meet carbon emission targets set by UK Building Regulations (Part L of the Building Regulations or as amended / updated). Proposals which exceed the fabric and energy efficiency performance in respect of carbon emissions will be afforded positive weight.
- 5) All developments are encouraged to complete a whole-life cycle carbon assessment in accordance with Royal Institute of Chartered Surveyors (RICS) Whole Life Carbon Assessment Guidance (as updated)
- 6) Developments should use appropriate design, construction, insulation, layout and orientation to create developments that are resilient to climate change, minimise energy use, use natural resources prudently, and promote the use, recovery and recycling of materials to reduce embodied carbon. This should include: -
 - a) The use of blue and green infrastructure, trees and other planting to provide opportunities for cooling and shading, to connect habitats by using native plants that can meet the predicted climatic condition.
 - b) The growing and sourcing of local food supplies (such as allotments).
 - c) The maximisation of both natural heating and ventilation through the orientation and location of buildings and choice (and colour) of materials.
 - d) The minimisation of the generation of waste and energy consumption in the design, construction, use and life of buildings.
 - e) Evidence of construction methods that maximise the use of locally sourced recycled materials.
 - f) Wherever possible, retain and creatively re-use existing buildings as part of new development to minimise the release of embodied carbon. To design new buildings to enable easy material re-use and disassembly, reducing the need for end-of-life demolition.
 - g) Promoting sites with the best opportunities for the sustainable travel modes to jobs, services, facilities and education
 - h) Development should be designed to promote walking, cycling and public transport to minimise carbon emissions from vehicular traffic
 - i) For major development that contains existing buildings / structures to carry out a pre-development and / or pre-demolition audit, following industry best practice
 - j) Promote sustainable approaches to surface water management and flood risk adaptation measures, where appropriate, in line with other policies in the Plan.
- 7) Development proposals should provide space for physical protection measures and / or make provision for the future relocation of vulnerable development and infrastructure, where demonstrated as necessary to ensure the future resilience of communities and infrastructure to climate change impacts.
- 8) Opportunities for extensions to the district heat network at Keele University should be explored. New development with the potential to connect or extend a heat network should assess the feasibility of this option before considering other heat sources.

Policy CRE1: Climate Change

- 9) Development proposals should include green spaces and tree planting measures (including maintenance) that will improve the environment through carbon capture.
- 10) Schemes that help to deliver the Council's Carbon Capture Areas and Urban Tree Planting Strategy to facilitate carbon capture will be supported.
- 11) Climate change measures should take account of impact on the historic environment to protect the significance of heritage assets, including their setting. Development, affecting heritage assets should also consider the appropriate retrofitting of those assets in the Borough.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CRE1	++	+	+	++	+	+	+	+	+	+	+	0

- G.4.1.1 Policy CRE1 seeks to ensure that development within Newcastle-under-Lyme contributes towards the mitigation of, and adaptation to, climate change and helping to achieve the national target for net zero carbon emissions by 2050.
- G.4.1.2 Under this policy, all new development will need to demonstrate an exceedance of the carbon emission targets as set out in the Building Regulations Part L¹⁰, and ensure that the design of development is in line with the energy hierarchy seeking to first reduce the demand for energy, improve energy efficiency, and utilise low carbon or renewable energy resources where possible. Natural heating and ventilation is also encouraged.
- G.4.1.3 The policy further seeks to ensure that development proposals consider ways in which the "*design, construction, insulation, layout and orientation*" of developments can incorporate climate change resilience, minimising energy use and encouraging the efficient use of natural resources. The policy promotes the re-use of existing buildings to minimise the release of embodied carbon, in addition to the "*minimisation of the generation of waste and energy consumption in the design, construction, use and life of buildings*". A major positive impact on natural resources and waste could therefore be achieved (SA Objective 4).
- G.4.1.4 By promoting energy efficient and resilient building design, as well as encouraging opportunities for expanding the district heat network at Keele University, the policy will also be expected to help provide safe homes and affordable warmth. The policy encourages including allotments alongside new developments to grow food locally, reducing the carbon footprint of produce and providing opportunities for outdoor activity and community cohesion. These measures are likely to have benefits for mental and physical wellbeing as well as equality (SA Objectives 9 and 10).

¹⁰ DLUHC and MHCLG (2023) The Building Regulations 2010: Conservation of fuel and power: Approved Document L. Available at: <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l> [Date accessed: 30/05/24]

- G.4.1.5 More efficient use of energy and natural resources will help to reduce the demand for energy, and consequently could lead to lower emission of air pollutants. There is potential for the policy to lead to a minor positive impact on air quality (SA Objective 2).
- G.4.1.6 Policy CRE1 will help to encourage new developments to use water more efficiently. By adopting the higher optional requirement for water consumption of 110 litres per person per day as set out in the Building Regulations, water consumption will be reduced. A minor positive impact on water resources is identified (SA Objective 6).
- G.4.1.7 The policy requires development proposals to incorporate blue and green infrastructure, including seeking opportunities to enhance ecosystem services such as carbon sequestration and provide multi-functional benefits in terms of natural cooling and shading, reducing the urban heat island effect. This will also be expected to help reduce fluvial and surface water flood risk through providing natural flood storage and drainage and slowing water runoff rates, leading to a minor positive impact on flooding (SA Objective 5).
- G.4.1.8 Furthermore, the policy encourages the use of green/blue infrastructure to improve habitat connectivity and planting native species, with a likely minor positive impact on biodiversity (SA Objective 3). Enhanced green/blue infrastructure could also help to improve the local landscape character, to some extent (SA Objective 8).
- G.4.1.9 The policy encourages development to be designed to promote walking, cycling, and sustainable modes of transport, and is therefore likely to have a minor positive impact on access to sustainable transport (SA Objective 11).
- G.4.1.10 Policy CRE1 encourages retrofitting historic buildings with climate change measures, where appropriate, which could help to improve the energy efficiency of historic buildings and encourage the conservation and renewal of cultural heritage assets. With careful planning to ensure the historic significance is protected, a minor positive impact on cultural heritage could be achieved (SA Objective 7).
- G.4.1.11 Overall, a major positive impact on climate change is expected (SA Objective 1).

G.4.2 Policy CRE2: Renewable Energy

Policy CRE2: Renewable Energy

1. Development proposals should optimise the use of decentralised, renewable or low carbon energy sources. All 'major' proposals for residential and non-residential development should provide an energy statement which demonstrates the maximum feasible and viable use of onsite renewable energy generation for at least 10% of their energy needs from renewable or low carbon energy generation on site unless the applicant can clearly demonstrate that having regard to the type of development and its design, this is not feasible or viable.
2. The development of renewable or sustainable energy technologies, storage of energy and complementary infrastructure will be supported, subject to conformity with Local Plan policies and the consideration of the cumulative impact of the proposed development along with other committed or completed development.
3. Renewable and low carbon energy schemes that result in a significant adverse impact on the following will not be supported; -
 - a) The surrounding landscape and townscape including buildings, features and adjoining land uses;
 - b) Habitats and species of internal, national and local importance

Policy CRE2: Renewable Energy

- c) Residential amenity including visual intrusion, air, dust, noise, odour, traffic and recreation access;
 - d) The operation of air traffic movement and safety;
 - e) The historic environment.
 4. Evidence should also be provided of construction methods that maximise the use of locally sourced recycled materials and minimises the use of non-renewable energy sources.
 5. Associated development and buildings such as access roads, fencing, and lighting must be designed to minimise their visual impact, whilst ensuring public safety and without compromising site security.
 6. Proposals should include a decommissioning statement, detailing the lifespan of the technology and how the full restoration of the site will be ensured.
 7. In addition to the above, large scale solar energy proposals should also:
 - a) Demonstrate that available brownfield sites have been examined and discounted before greenfield development considered.
 - b) Avoid the loss of best and most versatile land
 - c) Maximise efficiency through solar panel orientation
 - d) Be supported by a glint and glare assessment, where necessary
- Outside of permitted development, solar energy schemes on the roofs of commercial or domestic properties will be supported where they do not conflict with other Local Plan policies, particularly in relation to heritage assets. Schemes will be encouraged to maximise solar gain through appropriate layout, design and orientation.
8. For wind energy proposals, less constrained potential opportunity areas suitable in principle for wind energy development are shown on the Policies Map. Wind energy proposals, in addition to the above, must also demonstrate all of the following: -
 - a) Proposals do not adversely affect the integrity of ecological designations.
 - b) Impacts of the proposed wind energy development on key landscape characteristics are minimised.
 - c) Sufficient distances can be maintained between the proposal and sensitive receptors to protect amenity, particularly with respect to noise, light and visual impacts.
 - d) Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and the proposal has their support.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CRE2	++	+	0	+	0	0	0	0	0	0	0	0

G.4.2.1 Policy CRE2 promotes climate change resilience, through encouraging the generation and use of decentralised, low-carbon and renewable energy sources, provided that such schemes do not adversely affect sensitive receptors.

G.4.2.2 The use and generation of renewable energy will help to reduce the reliance on energy produced by fossil fuels. Under Policy CRE2, all development proposals for 10 or more homes or an area of 0.5ha or more (residential), and over 1ha (non-residential), will be required to provide an energy statement that demonstrates the maximum feasible and viable use of onsite renewable energy generation for at least 10% of their energy needs from renewable or low carbon energy sources. The encouragement of these schemes under Policy CRE2 will therefore be likely to reduce the borough's contribution towards

- carbon emissions, and increase the uptake of more sustainable energy sources, leading to a major positive impact on climate change mitigation (SA Objective 1).
- G.4.2.3 In addition, the promotion of alternative renewable and low carbon technologies will be likely to result in reduced emission of pollutants. A minor positive impact on air quality in the Plan area is therefore identified (SA Objective 2).
- G.4.2.4 The policy promotes sustainable construction methods which utilise locally sourced and recycled materials, which could potentially result in a minor positive impact on the conservation of natural resources and minimisation of waste (SA Objective 4).
- G.4.2.5 The policy states that renewable and low carbon energy schemes will not be supported where they could lead to significant adverse effects on landscape/townscape character, habitats and species, residential amenity, pollution (including air, dust, noise and odour) and the historic environment. By seeking to reduce the potential for adverse effects on these receptors, a negligible impact is expected in terms of biodiversity, cultural heritage, landscape and human health (SA Objectives 3, 7, 8 and 9), depending on the specific location and nature of any future proposals for these uses, which will need to be assessed on a case-by-case basis.

G.5 Housing

G.5.1 Policy HOU1: Affordable Housing

Policy HOU1: Affordable Housing

- 1) On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:
 - a) 30% of all units on greenfield sites.
 - b) 15% of all units on brownfield sites within the 'low value zone' as shown on the policies map.
 - c) 25% of units on brownfield sites within the 'high value zone' as shown on the policies map.
- 2) Where the affordable housing calculation results in fractions of homes, the number will be rounded up or down to the nearest whole unit.
- 3) At least 25% of the affordable housing provision will be delivered as First Homes, which will be available to first-time buyers at a minimum 30% discount from market value and in accordance with other national policy requirements concerning First Homes. The tenure split for affordable housing should be provided in line with the latest guidance.
- 4) Affordable housing should be provided on-site. Off-site financial contributions will only be considered in exceptional circumstances where it is demonstrated that it is not feasible to deliver the homes on site. As a first alternative off-site provision of affordable housing will be accepted. As a second alternative, a financial contribution may be accepted, where justified, in lieu of on-site provision. This will be calculated in accordance with the latest information on the Council's website.
- 5) Where it has been robustly justified that the proportion of affordable housing sought would not be viable, the maximum proportion of affordable housing will be sought that does not undermine the development's viability. Financial viability assessments conforming to an agreed methodology will be required and, where necessary, the LPA will arrange for them to be independently appraised at the expense of the applicant.
- 6) Applicants will normally be required to enter into legal agreements to ensure that the housing is provided and retained, (or in exceptional circumstances) that the subsidy will be recycled for alternative affordable housing provision and available to meet the needs of people with a local connection. An enabling fee will be charged for each new affordable dwelling that is secured through a S106 agreement (in addition to any S106 monitoring fee), except for First Homes.
- 7) Affordable housing should be integrated with the provision of market housing and suitably pepper potted across the development, achieving high quality design, and be indistinguishable from market dwellings unless specific circumstance suggests clustering and/or a distinctive design is appropriate. The exception is blocks of flats, where a mixed tenure block can potentially cause management and leasehold issues.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU1	0	0	0	0	0	0	0	+	+	++	0	0

G.5.1.1 Policy HOU1 will help to ensure that the Local Plan delivers an appropriate distribution of affordable housing that meets the varied needs of current and future residents of the borough.

G.5.1.2 The policy sets out the requirements for major development sites, i.e. those of 10 or more homes or an area of 0.5ha or more, to deliver a proportion of dwellings as affordable homes, depending on the nature of the site (brownfield or greenfield). The policy will help

to ensure that there is an appropriate mix of affordable homes, including first homes, socially rented housing, and the provision of affordable older persons accommodation, dependent on the locally identified housing needs. A major positive impact on equality and housing provision is expected (SA Objective 10).

G.5.1.3 Through seeking to meet the needs of the local population, the policy will help to ensure that people can live comfortably and safely in appropriate and affordable housing. As such, the policy will potentially have a minor positive impact on human health (SA Objective 9).

G.5.1.4 The policy promotes high-quality design and states that affordable homes should be “*indistinguishable from market dwellings*”, suggesting that new developments will be in-keeping with the existing character of the neighbourhoods. A minor positive impact on the local landscape could be achieved (SA Objective 8).

G.5.2 Policy HOU2: Housing Mix and Density

Policy HOU2: Housing Mix and Density

- 1) Residential development proposals will generally be expected to achieve the following net densities:
 - a) On sites within the strategic centre of Newcastle-under-Lyme,, residential development should achieve a net density of around 30-50 dwellings per hectare
 - b) On sites within the urban centre of Kidsgrove, development should achieve a net density of around 30-40 dwellings per hectare
 - c) On sites within Rural Centres listed in policy PSD2 Settlement Hierarchy, development should achieve a net density of around 20-30 dwellings per hectare
 - d) In accordance with the densities or other relevant design requirements in ‘Made’ Neighbourhood Plans, where appropriate
- 2) The density of residential development set out in criterion 1 should also reflect site context, access to local services and facilities alongside the character of the area. Lower densities may be appropriate in more sensitive locations including Conservation Areas and in response to Listed Buildings and their settings, areas of archaeological interest or ecological / biodiversity value and areas affected by flood risk.
- 3) Residential development should be delivered of an appropriate type and size, consistent with the most up to date evidence including Housing and Economic Development Needs Assessments (HEDNA) and Housing Needs Assessments (HNA) to address local needs and market demand. The mix of units will also have regard to the current Housing Register, Neighbourhood Plans, Parish Surveys, Parish Plans and the latest Council Position Statements.
- 4) For major development, provision for specific housing needs, including older people who require specialist housing, should be considered. This will need to take into account the location and accessibility of the site as relevant to the type of household occupiers.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU2	0	0	0	0	0	0	0	0	+	++	0	0

G.5.2.1 Policy HOU2 aims to ensure that the Local Plan delivers an appropriate density and mix of housing to meet the varied needs of current and future residents, whilst responding to the local characteristics and sensitivities.

- G.5.2.2 By providing a suitable mix of housing types and tenure, in line with the locally identified needs, this policy is expected to meet the varied needs of residents, and as such, have a major positive impact on housing provision and equality (SA Objective 10).
- G.5.2.3 The policy supports the development of housing for older people or people with special needs, considering accessibility and the location of the proposed development. By seeking to meet the needs of the population, a minor positive impact on health and wellbeing is likely (SA Objective 9).
- G.5.2.4 The policy further seeks to ensure developments take into account sensitive receptors such as conservation areas, listed buildings, areas of flooding or archaeological interest or ecological / biodiversity value and landscape character. The considerations of these receptors under the policy could help to minimise the potential for adverse effects on biodiversity, flooding and cultural heritage (SA Objectives 3, 5, 7 and 8).

G.5.3 Policy HOU3: Housing Standards

Policy HOU3: Housing Standards

1. All new residential homes (including conversions) will be provided to Part 4(2) standard (Accessible Adaptable Dwellings) set out in Building Regulations and the Nationally Described Space Standards (NDSS) (size) or the Building Control space standard relevant at the time of determining the application.
2. On major residential developments and specialist housing for older people, 10% of market dwellings should meet the requirements of Building Regulations Part M4(3)(2)A wheelchair adaptable homes standard and 10% of affordable / social rented housing should meet the requirements of Part M4(3)B accessible homes standard (or Government equivalent), where there is a demonstrable need in the local area.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU3	0	0	0	0	0	0	0	0	+	+	0	0

- G.5.3.1 Policy HOU3 aims to ensure that the Local Plan delivers development that meets specific housing standards, ensuring that the varied needs of current and future residents are met.
- G.5.3.2 Under the policy, development will be required to meet the requirements of Building Regulations Part 4(2) standard (Accessible Adaptable Dwellings), including for wheelchair users under Part M4(3)(2)A, and the Nationally Described Space Standards (NDSS). In line with the locally identified needs, this policy is expected to meet the varied needs of residents, and as such, have a minor positive impact on housing provision and equality (SA Objective 10).
- G.5.3.3 The policy supports the development of housing for older people and for people with special needs, taking into account accessibility of the proposed development. By seeking to provide suitable and safe housing to meet the needs of the population, a minor positive impact on health and wellbeing is likely (SA Objective 9).

G.5.4 Policy HOU4: Gypsy, Travellers and Travelling Showpeople

Policy HOU4: Gypsy, Travellers and Travelling Showpeople

- 1) Sites will be approved to meet the needs set out in the most recent Gypsy and Traveller Accommodation Needs Assessment (GTAA), this will include: -
 - a) The site at G & T 8 Land West of Silverdale Business Park as shown on the adopted policies map is suitable for Gypsy and Traveller use to ensure a supply of pitches
 - b) The site at G & T 11 Land at Hardings Wood Road, Kidsgrove as shown on the adopted policies map is suitable for an intensification of uses for Travelling Showpeople
- 2) Proposed Gypsy, Traveller and Travelling Showperson sites should make sure that they: -
 - a) Respect the scale of, and do not dominate, the nearest settled community when located in rural areas;
 - b) Avoid placing an undue pressure on the local infrastructure, highways and services;
 - c) Are well planned, including clearly marked site and pitch/plot boundaries and appropriate boundary treatment;
 - d) Provide a safe environment for intended occupants through access, layout, design and lighting;
 - e) Provide adequate space for parking, turning and servicing;
 - f) Provide for an appropriate level of essential services and utilities to service the site
 - g) Make provision for waste to be stored appropriately for disposal and be collected/recycled in an efficient manner.
- 3) Alongside the consideration of criteria 1 above, proposals for Gypsy and Traveller and Travelling Showperson sites should not conflict with other local or national policies relating to flood risk, contamination, landscape character, protection of the natural and built environment, heritage assets or agricultural land quality unless mitigation is possible. A proposal should be located within reasonable travelling distance to local amenities, urban services and both primary health care facilities and schools, preferably by walking, cycling or public transport.
- 4) There will be a presumption against the loss of existing permanent consented Gypsy, Traveller and Travelling Showperson sites where this would result in an identified shortfall in the Borough, unless suitable replacement provision of equal or enhanced value are provided.
- 5) Opportunities for the intensification and extension of existing Gypsy and Traveller and Travelling Showperson sites will be supported when the policy requirements outlined above are satisfactorily addressed.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU4	0	-	0	-	0	-	0	0	-	+	+	0

G.5.4.1 In accordance with the Planning policy for traveller sites¹¹, Gypsies and Travellers are defined as *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.

G.5.4.2 Travelling Showpeople are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes*

¹¹ MHCLG (2015) Planning policy for traveller sites. Available at: www.gov.uk/government/publications/planning-policy-for-traveller-sites [Date accessed: 10/05/24]

such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"¹².

- G.5.4.3 Policy HOU4 sets out the Council's intention to deliver development sites to meet the needs of the local Gypsy, Traveller and Travelling Showpeople populations, in line with the findings of the Gypsy and Traveller Accommodation Assessment (GTAA). Through seeking to meet the accommodation needs of these communities, a minor positive impact on equality and housing provision is likely (SA Objective 10).
- G.5.4.4 Policy HOU4 sets out two sites for allocation including G&T Site 8 for Gypsies and Travellers, and G&T Site 11 for Travelling Showpeople. It should be noted that these sites have been assessed individually as part of the reasonable alternative site assessments (see **Appendix F** and **H**). The evaluation of site allocation policies, including the two proposed Gypsy and Traveller sites, is presented in **Appendix J**.
- G.5.4.5 In line with Policy HOU4, development proposals should be located "*within reasonable travelling distance to local amenities, urban services and both primary health care facilities and schools, preferably by walking, cycling or public transport*". Therefore, the policy could potentially lead to a minor positive impact on accessibility (SA Objective 11).
- G.5.4.6 The policy sets out criteria to ensure that future development proposals for pitches/plots will not result in significant adverse effects on the local landscape and highways and that adequate space and utilities infrastructure is provided.
- G.5.4.7 Site 11 is located within 200m of Kidsgrove AQMA, where site end users could potentially be exposed to higher levels of air pollution, and the proposed development could contribute towards an increase in traffic with implications for air quality. A minor negative impact on air (SA Objective 2) is therefore identified.
- G.5.4.8 Both Sites 8 and 11 coincide with small extents of surface water flood risk, and a small proportion of Site 11 lies within Flood Zones 2 and 3. In accordance with Policy HOU4 and national policy on flood risk, it is anticipated that new residents' dwellings will not be located in areas at risk of flooding. An overall negligible impact on SA Objective 5 is therefore likely.
- G.5.4.9 Given the proximity of the allocation Site 11 to the adjacent Trent and Mersey Canal, there is potential for Policy HOU4 to lead to a minor negative impact on water quality owing to increased runoff of pollutants during both construction and occupation of the site (SA Objective 6).
- G.5.4.10 Site 11 lies within the 'Trent and Mersey Canal, Hardings Wood' Conservation Area. Policy HOU4 seeks to ensure that allocated sites do not conflict with other local or national policies regarding heritage assets. As such, a negligible impact on cultural heritage (SA Objective 7) is identified.
- G.5.4.11 Site 8 coincides with 'The Acre Allotments' where there is potential for loss of this open space resource for the local community. A minor negative impact on health and wellbeing

¹² Ibid

is identified (SA Objective 9). Although Policy HOU4 aims to protect high quality agricultural land where possible, Site 8 comprises ALC Grade 3 land which could potentially represent some of the borough's best and most versatile (BMV) land. There is potential for a minor negative impact on natural resources (SA Objective 4).

G.5.5 Policy HOU5: Specialist Needs housing

Policy HOU5: Specialist needs housing

- 1) Proposals for new care homes and specialist accommodation, including for older people, will be permitted where:-
 - a) The development is located in an area well connected by public transport and close to key facilities including healthcare, retail and other community facilities
 - b) It is designed to meet the particular requirements of the specific user group it is intended for whilst being adaptable and responsive to changing needs over the lifetime of the development
 - c) Proposals for specialist housing for older people will meet the accessibility and wheelchair standards set out in Policy HOU3.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU5	0	0	0	0	0	0	0	0	+	+	0	0

G.5.5.1 Policy HOU5 outlines the requirements of proposals for new care homes and specialist accommodation.

G.5.5.2 Under the policy development should be located in an area well connected by public transport and close to key social facilities including healthcare, retail and other community facilities. Furthermore, the proposed development should be adaptable and accessible to meet the requirements of the specific user. In line with the locally identified needs, this policy is expected to meet the varied needs of residents and facilitate healthy lifestyles and locate site users within sustainable distance to key services, and as such, have a minor positive impact on health and wellbeing, housing provision and equality (SA Objectives 9 and 10).

G.5.6 Policy HOU6: Self Build and Custom Dwellings

Policy HOU6: Self Build and Custom Dwellings

- 1) The Council will view applications for self-build and custom-build housing favourably, subject to proposals being in accessible and sustainable locations and compliant with all other relevant Local Plan policies. Preference will be given to proposals located on suitable brownfield sites or infill plots within existing development curtilages to optimise the efficient use of land.
- 2) On major residential development schemes, a suitable proportion of serviced plots must be designated for self-build and/or custom-build opportunities. This proportion will be determined by the Council in line with demand identified on the Self and Custom Build Register, ensuring alignment with market needs.
- 3) Applications involving multiple Self / Custom Build plots should submit information that demonstrates a comprehensive consideration of overall site design and infrastructure provision. Self-Build proposals

Policy HOU6: Self Build and Custom Dwellings

should demonstrate the highest standards of design quality, aligning with relevant Local Plan policies (including PSD 7 Design) and incorporating the following principles:

- a. Sustainability: Self / custom build developments are strongly encouraged to incorporate sustainable practices, energy-efficient measures, and low-carbon construction methods, adhering to the principles outlined in policies CRE1 (Climate Change) and CRE2 (Renewable Energy). This supports the Council's wider commitment to climate action and resource conservation.
 - b. Accessibility: Self / custom build proposals should embrace the principles of accessible and inclusive design, aligning with relevant policies within the Local Plan to ensure that homes meet the needs of a diverse population throughout their lifespan.
- 4) Where an applicant considers the provision of self-build and/or custom-build housing to be unviable, they should submit a detailed viability assessment justifying this claim. Any associated costs incurred in verifying independently the claim of a proposal being unviable shall be borne by the applicant.
 - 5) Self / custom build plots should be marketed as self/custom build opportunities for a minimum of 1 year. If unsold, the plots can revert to open market housing.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU6	+	0	0	+	0	0	0	0	0	+	0	0

- G.5.6.1 Policy HOU6 outlines the requirements and principles that self-build and custom-build development should adhere to.
- G.5.6.2 Under this policy, the Council will favour the development on suitable brownfield sites or infill plots with existing development curtilages, optimising the use of previously developed land and as such, having a minor positive impact on natural resources (SA Objective 4).
- G.5.6.3 Applicants for self-build/custom build developments are encouraged to demonstrate high standards of design, incorporating sustainable principles throughout, including energy efficiency measures and low-carbon construction methods. These measures will support the Council's wider commitment to climate action and a minor positive impact on climate change is likely (SA Objective 1).
- G.5.6.4 Self-build/custom build developments are encouraged to embrace accessible and inclusive design; this policy is expected to meet the varied needs of residents, and as such, have a minor positive impact on housing provision and equality (SA Objective 10).

G.5.7 Policy HOU7: Homes in Multiple Occupation

Policy HOU7: Homes in Multiple Occupation

- 5) Proposals for:
 - a) Change of use from residential to a small House in Multiple Occupation (HMO) (Use Class C4) or to a mixed C3/C4 use within areas covered by Article 4 directions (Sidmouth Avenue, Gower Street, Granville Avenue, Northcote Place and King Street, Newcastle);
 - b) Change of use from residential to a large HMO (suis generis use class);
 - c) Provision of a new build HMO; or

Policy HOU7: Homes in Multiple Occupation

d) Change of use from other uses (other than Use Class C3) to HMO

Will be supported provided that development would:-

- a) Not result in more than 10% of residential properties within a 100m radius being in use as an HMO;
- b) Not result in a Use Class C3 dwelling being 'sandwiched' between two other HMO properties or other non-family residential uses.
- c) Not result in a continuous frontage of three or more HMOs or other non-family residential uses;
- d) Be located within a sustainable neighbourhood, where they are close to facilities and served by high frequency bus routes;
- e) not result in an adverse impact on the amenities of neighbouring residents in terms of overlooking, or levels of noise and disturbance;
- f) provide a good standard of living accommodation for future occupiers including communal living rooms, kitchens, laundry facilities;
- g) provide an area of outdoor amenity space of sufficient size to accommodate activities such as clothes drying and space to sit outside, suitable for the number of residents at the property and accessible to all residents;
- h) provide suitable car and cycle parking facilities, in accordance with the Council's Parking Standards; and
- i) provide suitable waste and recycling storage and collection solutions

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU7	0	0	0	0	0	0	0	0	+	+	+	0

G.5.7.1 Policy HOU7 outlines the measures that proposals for homes in multiple occupation (HMO) will be required to demonstrate, in order to be supported by the Council.

G.5.7.2 Under the policy, HMOs will be supported where development provides sustainable access to local facilities, including the provision of suitable waste and recycling storage solutions, and are located in a sustainable neighbourhood that is served by high frequency bus routes. The provision of suitable cycle parking facilities will also be supported, facilitating sustainable modes of transport and active transport. Measures under this policy are likely to have a minor positive impact on health and wellbeing, and transport and accessibility (SA Objectives 9 and 11). The policy will benefit from further clarity on the expectations regarding waste solutions from the proposed development.

G.5.7.3 Under the policy, a good standard of living accommodation for future occupiers is supported as well as provision of outdoor amenity space, which can facilitate social interaction and enable social cohesion. This policy is expected to contribute towards meeting the varied housing needs of the local population, and as such, have a minor positive impact on housing provision and equality (SA Objective 10).

G.5.8 Policy HOU8: Rural and First Homes Exception Sites

Policy HOU8: Rural and First Homes Exception Sites

- 1) Proposals for affordable housing on rural exception sites will be permitted provided that:-
 - a) The proposed development directly adjoins the settlement boundary of rural service centres or settlements within the 'other settlements or rural areas' tier of the settlement hierarchy and have reasonable access to existing employment, services and facilities including public transport;
 - b) the scale and location of the site relates well to the existing settlement and landscape character, with a site not exceeding a maximum of 1 hectare or 5% of the size of the existing settlement, whichever is the smaller;
 - c) the proposal is accompanied by evidence which demonstrates that there is an unmet need within the parish, having regard to local housing needs assessments and / or the Housing Register and 'made' Neighbourhood Plans;
 - d) a local connection to the parish can be demonstrated whereby a member of each household has met the requirement of the Housing Allocations policy of the Council.
 - e) the housing will remain affordable and available to meet the continuing needs of local people in perpetuity;
 - f) the number, size, type and tenure of affordable homes should be based on robust and up to date evidence of local need;
 - g) an assessment of deliverable sites within the parish has been undertaken and informed the selection of the proposed site;
 - h) where a proposal also includes open market housing to enable deliverability, that this is on the same site and demonstrated as being limited to the necessary maximum proportion of market housing in order to achieve viability and is in proportion to the size of the development. In such cases, a viability assessment will be submitted to demonstrate that cross-subsidisation is necessary and will be independently verified at cost to the applicant.
- 2) In addition to the requirements above, proposals for first homes exception sites will be permitted where the following criteria are met:
 - a) the proposed development is located on unallocated land outside the Green Belt;
 - b) where a proposal also includes other forms of affordable housing, there must be evidence of local need and that it would assist with viability of the sustainability of the scheme. Applicants may alter the proportions of affordable housing to include small quantities (up to 25%) of other affordable housing products;
 - c) the homes will remain first homes in perpetuity;
 - d) the first homes provided are occupied by first-time buyers who meet the local connection test;

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU8	0	0	0	+/-	0	0	0	0	+	+	0	+

G.5.8.1 Policy HOU8 outlines the measures that proposals for rural exception sites should follow. The policy states that the scale and location of the proposed development should relate well to the existing settlement and landscape character, where measures to control the size of the proposal are included *"with a site not exceeding a maximum of 1 hectare or 5% of the size of the existing settlement, whichever is the smaller"*. The considerations of the local landscape under the policy could help to minimise the potential for adverse effects on landscape character (SA Objective 8).

- G.5.8.2 The policy will support development that is affordable and has access to existing employment, services and facilities including public transport. The policy is expected to contribute towards meeting the varied needs of residents, facilitate healthy lifestyles and locate site users within sustainable distance to key services, and as such, have a minor positive impact on health and wellbeing, housing provision, equality and employment opportunities (SA Objectives 9, 10 and 12).
- G.5.8.3 The policy supports rural exception sites adjoining settlement boundaries, where new development could potentially be located on previously undeveloped land. As such, development proposals could potentially result in the loss of soil, although, without knowledge of specific locations the effect on natural resources is uncertain (SA Objective 4).

G.5.9 Policy HOU9: Community Led Exception Sites

Policy HOU9: Community Led Exception Sites

- 1) Proposals for community led development (as defined in the NPPF, Annex 2) will be permitted provided that:-
- The development is located on land adjacent to an existing settlement boundary not allocated for housing;
 - The development comprises one or more types of affordable housing as defined in Annex 2 of the NPPF and which through local evidence it is demonstrated meets the affordable housing needs of the parish;
 - The scale and location of the site relates well to the existing settlement and landscape character, with a site not exceeding a maximum of 1 hectare or 5% of the size of the existing settlement, whichever is the smaller;
 - Where a proposal also includes open market housing to enable deliverability, that this on the same site and demonstrated as being limited to the necessary maximum proportion of market housing in order to achieve viability and is in proportion to the size of the development. In such cases, a viability assessment will be submitted to demonstrate that cross-subsidisation is necessary and will be independently verified at cost to the applicant.
 - The form, design and housing mix of development will comply with relevant Local Plan policies including policies PSD7, HOU2 / 3.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU9	0	0	0	+/-	0	0	0	0	0	+	0	0

- G.5.9.1 Policy HOU9 outlines the principles community led exception development will need to follow. Under the policy the scale and location of the proposed development should relate well to the existing settlement and landscape character, where measures to control the size of the proposal are included *"with a site not exceeding a maximum of 1 hectare or 5% of the size of the existing settlement, whichever is the smaller"*. The considerations of the local landscape under the policy could help to minimise the potential for adverse effects on landscape character.

- G.5.9.2 Under this policy, the design, housing standards and mix of development will be in accordance with other relevant Local Plan policies (PSD7, HOU2, HOU3) and will therefore be expected to meet the varied needs of residents, and as such, have a minor positive impact on housing provision, and equality (SA Objective 10).
- G.5.9.3 The policy supports exception sites adjoining settlement boundaries, where new development could potentially be located on previously undeveloped land. As such, development proposals could potentially result in the loss of soil, although, without knowledge of specific locations the effect on natural resources is uncertain (SA Objective 4).

G.5.10 Policy HOU10: Extensions, Alterations and Relationships between Dwellings

Policy HOU10: Extensions, Alterations and Relationships between Dwellings

- 1) Extensions and alterations to existing dwellings and construction of ancillary outbuildings in residential curtilages should
 - a) meet the design quality requirements of policy PSD 7 Design;
 - b) be in keeping with the scale, character, and appearance of their surroundings and the local area, visually subordinate to the existing dwelling with due regard to the amenity of surrounding properties;
 - c) respect the amenity of neighbouring properties. Consideration should be given to potential impacts on privacy, outlook, and overshadowing;
 - d) consider the accessibility needs of residents and visitors, promoting the principles of inclusive design and ensuring adaptability for a diverse range of users;
 - e) include suitable provision for access and parking in line with the requirements set out in the Plan; and
 - f) consider the sustainable disposal of waste and ensure appropriate bin storage.
- 2) Extensions and alterations are encouraged to incorporate measures that improve the energy efficiency and sustainability of the dwelling.
- 3) Proposals for housing development should generally meet the space standards of 12 metres front to front buildings and 21 metres back to back dwellings unless the design and layout of the schemes and its relationship to the site and its characteristics provide an adequate degree of light, amenity and privacy between buildings.
- 4) New development should be designed to minimise the obstruction of daylight and sunlight to existing dwellings. No obstruction should be created beyond a 45-degree horizontal or vertical angle measured from the midpoint of existing principal windows. Proposals should also consider the potential for visual dominance from new buildings and the impact on outlook from existing dwellings.
- 5) Each dwelling should normally be set back at least 1 metre from the side boundary and where necessary to provide a car parking space at the front of the dwelling, each dwelling should be set back at least 5.5 metres from the highway to provide car parking space off the highway.
- 6) Where houses have three or more bedrooms, a private garden should be provided of at least 65 square meters.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU10	0	0	0	0	0	0	0	+	0	+	0	0

- G.5.10.1 Policy HOU10 includes the principles that extensions and alterations to existing dwellings and construction of ancillary outbuildings in residential curtilages should follow. Under the policy, proposals for these uses should provide a high standard of design in accordance with Policy PSD7 and *"be in keeping with scale, character, and appearance of their surroundings and the local area"*. A minor positive impact on the local landscape will be likely (SA Objective 8).
- G.5.10.2 Policy HOU10 includes measures to ensure that the accessibility of residents and visitors is considered, promoting inclusive design and ensuring the adaptability for a diverse range of users. The policy will therefore be expected to meet the varied needs of residents, and as such, have a minor positive impact on housing provision, and equality (SA Objective 10).
- G.5.10.3 Under the policy, extensions and alterations are encouraged to incorporate measures to increase energy efficiency and promote sustainable development of the dwelling. Stronger wording on such measures (or cross-reference to other Local Plan policies) will benefit Policy HOU10, outlining the various energy efficiency initiatives that could be seen at the proposed development.
- G.5.10.4 Policy HOU10 encourages sustainable disposal of waste and will ensure appropriate bin storage. The considerations of waste under the policy could help to encourage re-use and recycling of waste, although the policy will benefit from including stronger wording relating to waste and the encouragement of sustainable waste disposal, referencing any waste initiatives or relevant policies.

G.5.11 Policy HOU11: Tandem or Backland Development

Policy HOU11: Tandem or Backland Development

- 1) Proposals for tandem or backland development will only be permitted where they:-
- Demonstrate a satisfactory means of access that has an appropriate relationship with existing residential properties
 - Are sympathetic to the character and appearance of the surrounding area, including the choice of materials and landscaping
 - Respect the amenity of residents in both existing and proposed properties
 - Consider the sustainable disposal of waste and ensure appropriate bin storage
 - Are equal or subordinate in scale to surrounding buildings, particularly those fronting the highway.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HOU11	0	0	0	0	0	0	0	+	0	0	0	0

- G.5.11.1 Policy HOU11 outlines the principles that tandem or backland development will need to follow. Under the policy development will be required to be *"sympathetic to the character and appearance of the surrounding area, including the choice of materials and landscaping"* and respect the amenity of residents. By ensuring new developments will be

in keeping with the local character and appearance, the policy could lead to a minor positive impact on the landscape (SA Objective 8). However, it is recommended stronger wording regarding the conservation of the landscape character is included, reflecting the wording used in the NPPF¹³.

- G.5.11.2 Policy HOU11 encourages the sustainable disposal of waste and will ensure appropriate bin storage. The considerations of waste under the policy could help to encourage re-use and recycling of waste. However, Policy HOU11 will benefit from including stronger wording relating to waste and the encouragement of sustainable waste disposal, referencing any waste initiatives or relevant policies, and has therefore scored negligible for SA Objective 4.

¹³ DLUHC (2023) National Planning Policy Framework, December 2023. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date accessed: 13/05/24]

G.6 Employment

G.6.1 Policy EMP1: Employment

Policy EMP1: Employment

1. In accordance with Policy PSD1, proposals for employment development for Use Classes E(g) (uses which can be carried out in a residential area without detriment to its amenity), B2 (Industrial) and B8 (Storage and Distribution) will be supported in principle within the settlement boundaries of the Strategic, Urban and Rural Centres and on employment land allocated in the Plan to support growth and meet local employment needs.
2. Development within employment sites that is not within E(g)/B2/B8 use will only be supported where it is for an ancillary use. In these cases, proposals will need to demonstrate that they support, maintain or enhance the primary business and employment function of the site; and that the number and distribution of ancillary units would not result in an over-concentration that might affect the function and appearance of the area. The proposed use must also be compatible with adjacent land uses and not prejudice the operation, viability or future development of other businesses.
3. Where relevant, high quality sustainable transport connections should be provided as part of employment proposals
4. Where relevant, development should address operational requirements of lorry parks and freight storage
5. Major development proposals within employment sites, residential sites of 30 dwellings (or more) and other forms of development where occupiers generate 50 full time equivalent jobs will be required to enter into a site related Employment and Skills Plan to maximise local employment and training opportunities in each phase of the development during construction and at end user stage. This should support local people in accessing employment opportunities.
6. Proposals that support home working that reduce commuting journeys will be supported, subject to complying with other development plan policies.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++

G.6.1.1 Policy EMP1 seeks to meet the identified employment land needs within Newcastle-under-Lyme over the Local Plan period. The policy seeks to support proposals for the expansion, intensification or redevelopment of employment sites where this will not compromise other objectives of the Local Plan. Additionally, the policy requires that major development proposals within employment sites will enter into a "*site related Employment and Skills Plan*" to provide employment opportunities across the course of development during construction and at the end user stage. Overall, a major positive impact on the local economy is expected (SA Objective 12).

G.6.1.2 The provision of new employment land within existing employment areas will help to ensure that there are generally good levels of accessibility to employment opportunities; furthermore, the policy will ensure that employment sites provide "*high quality sustainable transport connections*". A minor positive impact on equality and accessibility, in terms of access to jobs, could be achieved (SA Objectives 10 and 11).

- G.6.1.3 Specific allocations are not set out in Policy EMP1. The policy also supports new development in principle, where it meets the criteria of the policy. As such, there is some uncertainty in the overall evaluation of the policy. The Draft Plan includes a suite of preferred sites for allocation for employment uses; each site has been assessed individually as part of the reasonable alternative site assessments (see **Appendix H**). The evaluation of site allocation policies is set out in **Appendix J**.
- G.6.1.4 There is potential for a range of sustainability impacts in regard to SA Objectives 1, 2, 3, 5, 6, 7, 8 and 9 depending on the specific locations; therefore, for the purposes of this policy assessment, the overall impact recorded under these objectives remains uncertain.
- G.6.1.5 Nevertheless, the development of new employment sites is expected to result in the loss of previously undeveloped land to some extent and result in the loss of soil resources. Therefore, this policy will be likely to result in a minor negative impact on the Plan area's natural resources (SA Objective 4).

G.6.2 Policy EMP2: Existing Employment Sites

Policy EMP2: Existing Employment Sites

- 1) Within areas of existing employment land, proposals for alternative uses will be considered positively having regard to other relevant planning policies and whether the following criteria are satisfied:
 - a) Proposals are compatible (via scale, design and location) with adjacent existing and proposed land uses and any impact on amenity can be appropriately mitigated; and either:
 - b) the land or building is no longer suitable for employment use and there is no realistic prospect of re-use or redevelopment for employment use; or
 - c) the loss of land or buildings would not adversely affect economic growth and employment opportunities in the area the site or building would likely serve; or
 - d) Where the operation of an existing business could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
- 2) The information to be submitted by applicants to satisfy EMP2, and the steps taken to assemble that information, will be assessed on a case by case basis.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
EMP2	0	0	0	+	0	0	0	0	0	0	0	+

- G.6.2.1 Policy EMP2 outlines the requirements that proposals for alternative use to existing employment sites will need to follow, including where land is no longer suitable for employment use. The policy will ensure that the proposed alternative use will not adversely affect economic growth and employment opportunities in the area, through protecting existing viable employment sites from alternative development. A minor positive impact on the economy is expected (SA Objective 12).
- G.6.2.2 Policy EMP2 requires proposals to appropriately mitigate any impacts on amenity and will ensure the scale, design and location of the proposed development is compatible with

surrounding development and land use. A negligible impact on the local landscape character is identified (SA Objective 8).

- G.6.2.3 The redevelopment of existing employment sites is expected to result in reusing previously undeveloped land to some extent, and thereby lead to the protection of associated soil resources. Therefore, this policy could potentially result in a minor positive impact on the Plan area's natural resources (SA Objective 4).

G.6.3 Policy EMP3: Tourism

Policy EMP3: Tourism

- 1) Within the Borough, proposals for new or enhanced tourist development and permanent visitor accommodation (including hotels, bed and breakfasts and self-catering holiday lets) will be supported where:
 - a) The scale and type of the proposal is appropriate to its location;
 - b) The proposal is accessible by relevant transport modes including public transport key public transport; and
 - c) The proposal is for a main town centre use and is located within a designated retail centre. Where such facilities are proposed at other locations, the sequential and impact test requirements of Policy RET 1 (Retail) should be addressed.
- 2) Outside settlement boundaries, proposals for sustainable tourism development, in particular, that which improves access to and appreciation of the natural and historic environment, will be supported where it is in accordance with Policy RUR 1 (Rural Economy).
- 3) Outside settlement boundaries, proposals for new or enhanced tourist developments and new or enhanced touring caravan, camping and / or glamping sites will be supported where:
 - a) They are in accordance with the criteria set out at criterion 2 of Policy RUR 1 (Rural Economy);
 - b) In the case of a new facility, evidence is submitted to demonstrate that the proposed business is viable; and
 - c) In the case of a new small-scale touring caravan, camping and / or glamping site, evidence is submitted to demonstrate that the facility will meet an identified unmet need.
- 4) Outside settlement boundaries, new or enhanced permanent visitor accommodation (including small hotels, bed and breakfasts and self-catering holiday lets) will be supported where:
 - a) The proposals re-use, conserve and, where possible, enhance the significance of farm buildings (including historic buildings where they exist) in accordance with Policy SE9 (Historic Environment); and / or
 - b) Re-use disused buildings of substantial construction that are structurally sound and capable of conversion; and / or
 - c) Include replacement building/s in accordance with criterion 2 of Policy RUR 4 (Replacement Buildings Outside of Settlement Boundaries); and
 - d) The proposals are in accordance with criteria (g) to (n) set out at criterion 2 of Policy RUR 1 (Rural Economy).
- 5) Where permanent self-catering visitor accommodation is permitted, occupancy is likely to be restricted by planning condition to short stay holiday use only. A legal obligation may also be required to secure this, which may include a claw-back clause requiring the payment of a financial contribution towards the provision of affordable housing where it is subsequently evidenced that the accommodation is no longer required or viable as visitor accommodation and permission is granted for its use as permanent accommodation.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
EMP3	0	0	0	+	0	0	+	0	0	0	+	+

- G.6.3.1 Policy EMP3 outlines the requirements of new or enhanced tourist development and permanent visitor accommodation. The introduction of new tourist development will likely benefit the local economy, providing economic growth and providing new employment opportunities. Therefore, a minor positive impact is identified on the economy (SA Objective 12).
- G.6.3.2 Policy EMP3 requires that new development *"is accessible by relevant transport modes including public transport"*. The policy will ensure site end users have good access to sustainable transport modes and is therefore likely to have a minor positive impact on transport and accessibility (SA Objective 11).
- G.6.3.3 The policy will support development that re-uses disused buildings of substantial construction that are structurally sound, thereby utilising previously developed land and supporting an efficient use of land within the borough. Furthermore, the policy will support development that will re-use, conserve and enhance the significance of farm buildings that could include historic buildings. A minor positive impact is identified on natural resources and historic environment (SA Objective 4 and 7).
- G.6.3.4 Under the policy, any new development will be required to be of appropriate type and scale to the surrounding location, and the number of visitors generated as a result of the development will need to also be appropriate to the location. A negligible impact on the local landscape character is identified. Policy EMP3 could be enhanced through including stronger reference to the conservation and enhancement of the landscape character.

G.7 Retail

G.7.1 Policy RET1: Retail

Policy RET1: Retail

1. In order to protect, promote and retain the long-term vitality and viability of retail centres in the Borough, at retail hierarchy of centres is defined as follows:-

Role and Tier in Settlement Hierarchy	Centre Name	Centre(s)
Strategic Centre	Strategic Town Centre	Newcastle-under-Lyme Town Centre
Urban Centre	Town Centre	Kidsgrove Town Centre
	District Centres	Audley (Church Street), Chesterton (London Road), Silverdale High Street, Wolstanton High Street
	Local Centre	Baldwin's Gate (Newcastle Road), Loggerheads (Eccleshall Road), Madeley (Newcastle Road)
	Neighbourhood Parades	1. Bradwell (Hanbridge Avenue) Neighbourhood Parade 2. Butt Lane (Congleton Road) Neighbourhood Parade 3. Chesterton (Barbridge Road) Neighbourhood Parade 4. Clayton (Cambridge Drive) Neighbourhood Parade 5. Clayton (Clayton Road, opposite Abbot's Way) Neighbourhood Parade 6. Cross Heath (Liverpool Road) Neighbourhood Parade 7. Kidsgrove, Whitehill Road Neighbourhood Parade 8. Knutton (Knutton Lane) Neighbourhood Parade 9. May Bank (High Street) Neighbourhood Parade 10. Liverpool Road Neighbourhood Parade 11. Newcastle Town (George Street, Eastern End) Neighbourhood Parade 12. Porthill (Watlands View) Neighbourhood Parade 13. Rookery (High Street) Neighbourhood Parade 14. Seabridge (Tyne Way) Neighbourhood Parade 15. Talke (High Street) Neighbourhood Parade 16. Thistleberry (Paris Avenue) Neighbourhood Parade 17. Thistleberry/Town (Higherland/Drayton Street) Neighbourhood Parade 18. Westlands (Windermere Road) Neighbourhood Parade 19. Westbury Park (Westbury Road) Neighbourhood Parade

2. Development proposals for retail and leisure uses should reflect the role, function, and character of each respective centre in the retail hierarchy.
3. Town Centre boundaries for the Strategic Centre and Urban Centre are delineated and shown on the Policies Map. Development proposals for ,ain town centre uses, particularly use class E (a) retail development or investment to enhance existing use class E(a) retail provision will be supported within the town centres, District, Local and Neighbourhood Parades.
4. Development proposals for main town centre uses outside of defined centres should satisfy the requirements of the sequential test as set out in national planning policy.
5. Development proposals for retail and leisure uses that are located on the edge or outside of a defined centre, are not in accordance with an up to date plan and exceed the floorspace thresholds set out below, will have to demonstrate that they would not have a significant adverse impact in the terms set out in the National Planning Policy Framework where:-

Policy RET1: Retail

- The proposal provides a gross floorspace in excess of 500 square metres gross: or
 - The proposal is located within 800 metres of the boundary of Kidsgrove town centre, a district centre or local centre and is in excess of 200 square metres gross.
6. Retail convenience and comparison floorspace needs arising in the Borough over the Plan period will be met primarily through further retail development focused on sites in the Strategic and Urban Town Centre boundaries.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RET1	0	0	0	0	0	0	0	+	+	+	+	++

- G.7.1.1 Policy RET1 sets out the hierarchy of retail centres within Newcastle-under-Lyme, to help ensure that appropriate uses and scales of development are directed to the different settlements based on their capacities and role in the settlement hierarchy.
- G.7.1.2 The policy promotes retail uses in appropriate areas, within the defined centres, and will resist large scale developments for retail or leisure uses outside of these areas. In doing so, the policy has potential to help ensure good levels of accessibility as the bulk of the new development will be situated in the areas which are already well served by sustainable transport modes. A minor positive impact could be achieved with regard to transport and accessibility for the local community (SA Objective 11), although it is recommended that this policy could be strengthened through ensuring that permitted retail/leisure developments outside of the defined centres are accessible via public transport and active travel links.
- G.7.1.3 Supporting leisure developments could lead to a minor positive impact on human health and wellbeing, through encouraging exercise (SA Objective 9), in addition to facilitating interaction within the community (SA Objective 10).
- G.7.1.4 The policy seeks to ensure that new developments “*reflect the role, function, and character of each centre in the retail hierarchy*”, which will help to ensure that the buildings are well related to their surroundings. Promoting retail and leisure developments could also help to maintain and enhance the vitality and viability of the borough’s centres, leading to a major positive impact on the local economy (SA Objective 12) as well as the landscape/townscape character (SA Objective 8).

G.7.2 Policy RET2: Shop Fronts, Advertisements, New Signage

Policy RET2: Shop Fronts, Advertisements, New Signage

- 1) Any proposed signage and / or advertisements should be sensitively designed and suited to their purpose, with clear regard had to local amenity, the historic environment, public safety, place and context. Such uses will not be permitted if they are of poor quality and where they fail to improve the character, function, appearance and quality of an area.

Policy RET2: Shop Fronts, Advertisements, New Signage

- 2) In Conservation Areas, signage should be appropriately designed to complement the character and appearance of the local area. The use of illuminated signs and advertisement hoardings will be carefully considered, and proposals for such signage should demonstrate sensitivity to the surrounding environment, including the scale, materials, and lighting design. Illuminated fascia signs should generally consist of individually lit letters, with minimal light spill and glare.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RET2	0	0	0	0	0	0	+	+	0	0	0	0

- G.7.2.1 Policy RET2 requires proposed signage and / or advertisement to be "*sensitively designed and suited to their purpose*". The policy states that "*in Conservation Areas, signage should be appropriately designed to complement the character and appearance of the local area*", as such, proposals are required to have regard to the historic environment and local amenity and context and where proposals that fail to improve the local character, quality and appearance will not be permitted; the policy will therefore help to conserve the local landscape and the heritage assets supported by the landscape. A minor positive impact on cultural heritage and the local landscape character is identified (SA Objectives 7 and 8).

G.7.3 Policy RET3: Restaurants, Cafes, Pubs and Hot Food Takeaways

Policy RET3: Restaurants, Cafes, Pubs and Hot Food Takeaways

- 1) The building or change of use of establishments to restaurants and cafés, drinking establishments and hot food takeaways will be permitted provided they comply with other policies in the development plan and where there will be no adverse effect, either individually or cumulatively, on the character of the area, amenities of residential occupiers, community safety and/or highway safety.
- 2) Where permission is granted for such uses or for an extension of such use, conditions appropriate to the permitted use may be imposed relating to community safety, hours of opening, noise, odour and fumes, the disposal of refuse, and restricting the sale of hot food to be consumed off the premises.
- 3) Where hot food takeaways are located within 400 metres of a primary or secondary school, planning permission will be granted subject to a condition that the premises are not open to the public before 17:00 on weekdays and that there is no over the counter sales before that time. In Newcastle-under-Lyme and Kidsgrove town centres, the clustering of hot food takeaways should be avoided by ensuring no more than 2 hot food takeaways are located adjacent to each other.
- 4) Proposals for hot food takeaways should undertake a health impact assessment (HIA) undertaken by the applicant. Following the HIA, development that would have an unacceptable adverse impact, on health or wellbeing will not be permitted

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RET3	0	0	0	0	0	0	0	0	+	0	0	0

- G.7.3.1 Policy RET3 outlines the requirements for development proposals that include the building or change of use of establishments to restaurants and cafes, drinking establishments and hot food takeaways.
- G.7.3.2 Policy RET3 requires any hot food takeaway proposal located within 400 metres of a primary school or secondary school to only be permitted where the premises are not open to the public before 17:00, and that within Newcastle-under-Lyme and Kidsgrove town centres there is no clustering of hot food takeaways; which may help to encourage local residents to pursue healthier food choices. The policy also requires health impact assessments (HIA) to be carried out in support of proposals for hot food takeaways, where following an HIA, development that will have a negative adverse impact on health and wellbeing will not be permitted. Overall, a minor positive impact on the health and wellbeing of local residents is identified (SA Objective 9).
- G.7.3.3 Policy RET3 requires that the proposals will not have an adverse effect on the character of the area and that community safety is considered. Furthermore, the policy will not support development proposals that are likely to produce noise disturbances and odours, further conserving the local amenity. A minor positive impact on the local landscape character is identified under the policy (SA Objective 8).

G.7.4 Policy RET4: Newcastle-under-Lyme Town Centre

Policy RET4: Newcastle-under-Lyme Town Centre

- 1) The Council will, in principle, support opportunities for improving and enhancing the vitality and viability of Newcastle-under-Lyme Town Centre and immediate environs, this will include:-
 - a) Support for the retention of and improvements to the Market and public realm.
 - b) Support for the appropriate redevelopment of town centre sites listed in chapter 13 of the Plan
 - c) Following the completion of the multi-storey car park on the Ryecroft site (called Castle Car Park) there may be opportunities for the release of surface level car parks in and around the town centre for alternative uses.
 - d) Support for walking and cycling infrastructure improvements and other sustainable and active travel initiatives including measures to support wayfinding across the town. This will include support for schemes listed in the local walking and cycling infrastructure plans.
 - e) Support for improvements to digital infrastructure, including gigabit infrastructure and connectivity in the town
 - f) Support for improvements to sustainable public transport options, including enhancement of the bus station in the town
 - g) Support for the delivery of Knutton Village Masterplan
 - h) Support for opportunities to diversity retail, leisure or cultural opportunities in the town that will encourage footfall and contribute to the vitality of the town centre
 - i) Support for educational uses and appropriate business uses in the town to support the diversity of offer in the town

Policy RET4: Newcastle-under-Lyme Town Centre

- 2) The provision of additional residential accommodation will be supported in the town centre. Proposals for new residential accommodation in the town centre should be integrated effectively with existing businesses and community facilities and should ensure, appropriate and safe access arrangements and appropriate and well located waste management and recycling facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RET4	+	-	0	+	0	0	-	+	0	+	+	+

- G.7.4.1 Policy RET4 outlines the measures included to improve and enhance the Newcastle-under-Lyme Town Centre.
- G.7.4.2 It should be noted that the proposed sites for redevelopment in Newcastle-under-Lyme Town Centre, as cross-referenced within Policy RET4, have been assessed individually as part of the reasonable alternative site assessments (see **Appendix H**). The evaluation of site allocation policies, including those within Newcastle-under-Lyme Town Centre, is presented in **Appendix J**.
- G.7.4.3 Policy RET4 will provide support for permeability improvements that include walking and cycling infrastructure improvements, including the support of travel schemes listed in the local walking and cycling infrastructure plans. These improvements are expected to provide greater accessibility within the town centre and support the aim to improve wayfinding across the town. Furthermore, improvements to walking and cycling infrastructure will encourage local residents to pursue active travel. The policy additionally will support public transport options including the bus station located within the town, further encouraging residents to pursue sustainable transport methods. Overall, a minor positive impact on accessibility and sustainable transport is likely (SA Objective 11).
- G.7.4.4 The focus on promoting sustainable transport initiatives within Policy RET4, including public transport and a walkable public realm, could lead to associated benefits in terms of reducing transport associated GHGs and other air pollutants (SA Objectives 1 and 2). However, given the proposed allocation of new development within the town centre, including some sites within the Newcastle-under-Lyme AQMA, there remains potential for an adverse effect in terms of exacerbating poor air quality (SA Objective 2).
- G.7.4.5 The support for redevelopment of brownfield sites within the town centre will help to encourage an efficient use of land, leading to a minor positive impact in terms of promoting the conservation of natural resources (SA Objective 4).
- G.7.4.6 Policy RET4 will support opportunities to diversify retail, leisure or cultural enhancements to then encourage footfall within the town centre, which could benefit the local economy. To further diversify the town centre, the policy will support educational uses and appropriate business uses, further encouraging footfall, the creation of new jobs, and providing new educational opportunities. Overall, a minor positive impact on the local economy and education is identified (SA Objectives 10 and 12).

- G.7.4.7 Under the policy, support will be given to retain and improve the market and public realm within the town centre. Improvements to the market and public realm will be likely to have benefits to local townscape character, leading to a minor positive impact on SA Objective 8. The policy would benefit from stronger wording surrounding the town centre's character and how measures could conserve and enhance the local character.
- G.7.4.8 The town centre is home to many listed buildings. New development in close proximity to heritage assets may give rise to adverse impacts on the setting and significance of the assets without careful planning and design. Whilst there may be opportunities within regeneration schemes to improve the appearance or better reveal the significance of heritage assets, overall there remains potential for a minor negative impact on cultural heritage (SA Objective 7). The policy would benefit from including wording to conserve and enhance cultural heritage assets, or cross-reference to other relevant Local Plan policies to ensure clarity for the proposed development and redevelopment within the town centre.
- G.7.4.9 The provision of additional residential accommodation under the policy is required to be well located with respect to waste management and recycling facilities, which could encourage local residents to recycle more. Overall, a negligible impact on waste management is identified (SA Objective 6). Stronger wording relating to the waste management of local residents will benefit the policy, identifying any waste management schemes in the town centre or any local initiatives that could be further supported.
- G.7.4.10 The policy would be strengthened by using similar wording to RET5 to include GI within the town centre, to benefit from the associated ecosystem services provided from GI.

G.7.5 Policy RET5: Kidsgrove Town Centre

Policy RET5: Kidsgrove Town Centre

- 1) The Council will, in principle, support opportunities for improving and regenerating Kidsgrove Town Centre and its immediate environs including:-
 - a) The enhancement and refurbishment of Kidsgrove Train Station to include
 - Improved facilities for parking, including cycle parking.
 - Potential improvements to car parking provision for the benefit of the town and passengers, to include electric car parking provision
 - Improved wayfinding and links to the town centre and dedicated provision for taxis and buses (with real time bus passenger information)
 - b) Enhancement of and improved access to the Trent and Mersey Canal
 - c) Provision for a shared services hub in the town centre
 - d) Support for public realm improvements in the town centre including schemes that improve the pedestrian experience and local road network provided that they are consistent with the Kidsgrove Air Quality Management Area Management Plan.
 - e) Provision of green routes and pocket parks in and around the town centre

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RET5	+	+	+	0	+	0	0	+	+	0	+	+

- G.7.5.1 Policy RET5 outlines measures to improve and enhance the Kidsgrove Town Centre.
- G.7.5.2 The enhancement of the Kidsgrove Train Station, including improving accessibility, cycle parking provision, and improving wayfinding links to the town centre will encourage the use of the railway network to and from the town centre. Under the policy, support to the pedestrian experienced will be provided, encouraging active modes of travel around the town centre. Overall, improvements to the railway infrastructure and greater accessibility by foot within the town centre is expected to have a minor positive impact on sustainable transport and accessibility (SA Objective 11).
- G.7.5.3 The policy will also support the provision of green routes and pocket parks around the town centre, which could encourage more active lifestyles and provide associated health benefits with green space. Additionally, the associated GI could provide several ecosystem services which include carbon storage, flood risk reduction, filtration of air pollutants and the creation of new habitats and enhancement of wildlife corridors throughout the urban area. Overall, a minor positive impact is identified for SA Objectives 1, 2, 3, 5 and 9.
- G.7.5.4 Under the policy, support will be given to improve the public realm within the town centre. Improvements to the public realm, in addition to new GI, is likely to have a minor positive impact on the local townscape character (SA Objective 8) and may serve to improve the vibrancy and economic vitality of the town centre leading to a minor positive effect on the local economy (SA Objective 12). The policy could be enhanced through including stronger wording surrounding the town centre's character and how measures could conserve and enhance the local character.

G.8 Infrastructure and Transport

G.8.1 Policy IN1: Infrastructure

Policy IN1: Infrastructure

- 1) The Council will support infrastructure related development subject to other policies in the Local Plan.
- 2) The Council will work with infrastructure providers, neighbouring authorities and stakeholders to ensure that development is supported by appropriate utility, transport, social, community and environmental infrastructure delivered in a timely and sustainable manner.
- 3) Development should be located so as to make the best use of existing infrastructure. Where new or improved infrastructure is required to meet needs arising directly from a development or to mitigate any adverse impacts of a development on existing infrastructure, the development will make provision either through the direct allocation of land and / or planning obligation made under Section 106 of the Town and Country Planning Act 1990 or any other future 'developer contributions' regime towards the provision of infrastructure.
- 4) The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers, including where no feasible operational alternatives exist, development proposals for water and wastewater infrastructure in more sensitive areas such as open countryside, where the investment is needed to respond to future growth and environmental needs.
- 5) Development should have regard to and provide infrastructure in line with the latest Infrastructure Delivery Plan (IDP) and, in particular, the Delivery Schedule contained within this. The areas potentially subject to direct provision and / or provision of financial contributions towards include but are not limited to:
 - a) Affordable housing;
 - b) Highway and transport infrastructure including sustainable transport measures;
 - c) Flood prevention (including upgrades to existing provision and flood alert services) and surface water drainage including future maintenance;
 - d) Green infrastructure, including future maintenance;
 - e) Education;
 - f) Health care provision;
 - g) Biodiversity Net Gain and Nature Recovery Network
 - h) Historic Environment including heritage assets and public realm improvements
- 6) Where appropriate, developments will be required to incorporate new infrastructure onsite.
- 7) Developers will be required to work with appropriate providers to provide the necessary digital infrastructure to support broadband and associated infrastructure.
- 8) Where provision in accordance with policy cannot be delivered on-site or by the nature of the infrastructure involved is required to be provided off-site and is not the responsibility of the developer/applicant but a third party service provider, a financial contribution will be required. The level of the financial contribution will take into account the total contribution liability incurred by the development arising from all policy and site-specific requirements.
- 9) As an alternative to the above, where appropriate and in consultation with the relevant infrastructure provider, the Council will consider proposals by developers to provide the necessary infrastructure as part of their development proposals rather than making a financial contribution.
- 10) Infrastructure must be provided in a timely and, where appropriate, phased manner to serve the occupants and users of the development. For sites that are proposed for delivery over a number of phases/years, a Phasing and Delivery Strategy will be required to be submitted as part of any planning application.
- 11) Proposals for the maintenance and improvement of household waste recycling services in the Borough will be supported. This may include infrastructure improvements at Newcastle Recycling Centre at Leycett Lane to support the future operation of the site. Contributions from development proposals may be required to support the future operation of services in the Borough.

Policy IN1: Infrastructure

- 12) Land at Madeley High School, as shown on the Policies Map, is allocated to support the future expansion of the High School. Contributions from development proposals in the Plan may be required to support the future development of the school.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN1	+	0	+	+	+	+	+	0	+	+	+	0

- G.8.1.1 Policy IN1 seeks to ensure that the Local Plan provides appropriate and proportionate infrastructure to deliver the proposed development including utilities, transport, social, community and environmental infrastructure, with regard to the Infrastructure Delivery Plan.
- G.8.1.2 Under this policy, development proposals will need to provide, or contribute towards the provision of a range of infrastructure including utilities, affordable homes, highways and sustainable transport, flood management and prevention systems, GI and biodiversity net gain, schools and healthcare facilities. Therefore, minor positive impacts are likely across several SA Objectives including climate change, biodiversity, waste, flooding, water, cultural heritage, health, equality and transport (SA Objectives 1, 3, 4, 5, 6, 7, 9, 10 and 11).

G.8.2 Policy IN2: Transport and Accessibility

Policy IN2: Transport and Accessibility

- 1) New development should make appropriate provision for access by sustainable modes of transport to protect the integrity of the highway network and the Council will work with developers to ensure that development proposals which contribute towards an accessible, efficient and safe transport network that offers a range of transport choices and improves accessibility through sustainable modes of travel will be supported. All developments should meet, where relevant, the following criteria:
 - a) Be located where travel can be minimised and are not car dependent, and the use of sustainable transport and active travel modes maximised.
 - b) Minimise additional travel demand with measures such as travel planning, safe and convenient public transport, walking and cycling links, and integration with existing infrastructure.
 - c) Provide the necessary infrastructure to support low and ultra-low emission vehicles.
 - d) Protect, and where possible, enhance public rights of way, off road walking and cycling routes and waterways.
 - e) Not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking and servicing arrangements.
 - f) Not cause severe residual impacts on the road network, either direct and / or cumulative.
 - g) Not cause an unacceptable impact of development on the wider transport network and contributions to meeting the transport needs generated by the impact of development in the area
- 2) All applications likely to generate significant travel movements should be accompanied by a Transport Assessment and a Travel Plan which will address the following requirements: -
 - a) Demonstrate that the safety, capacity and efficiency of the highway network will not be severely affected by development including local traffic circulation and existing parking and servicing arrangements.

Policy IN2: Transport and Accessibility

- b) Show how the proposed development will link into and enhance existing or proposed walking, cycling or public transport infrastructure such as bus services.
- c) Encourage and enable sustainable and active travel alternatives (such as walking, cycling or public transport use such as the bus network).
- d) Travel Plans prepared for major developments will be required to monitor the effectiveness of the mitigation measures being delivered. Travel plans should monitor targets for the maximum trips generated by a site.
- 3) The Council requires all development proposals to consider what is appropriate parking provision based on the following parameters and the detailed principles set out in Policy IN3 : -
 - a) Developments have designated parking and consider what existing parking is available;
 - b) Developments consider the impact of safety and residential amenity of on street parking and have identified measures to overcome this;
 - c) Any employment premises have considered appropriate parking measures for their employees and operational needs, including freight;
 - d) Developments consider priority and secure parking cycles, other non-car transport and electric vehicles as a means of promoting their use;
 - e) Development should make appropriate provision for deliveries and servicing in terms of road safety, traffic congestion and environmental impacts.
- 4) Development proposals should ensure design, access and egress of the development safeguards the needs of pedestrians, cyclists and buses as well as emergency services, deliveries and refuse collection vehicles with routes that are accessible and appropriately lit.
- 5) Development which supports the viability and vitality of Kidsgrove Railway Station will be supported. Proposals should improve connectivity and linkages between the town centre and railway station and provide for an attractive public realm.
- 6) Development proposals affecting the Borough's waterways should include environmental improvements and make a positive contribution to the visual appearance of the water corridor to support active travel links.
- 7) Development that enables the efficient and sustainable movement of freight will be supported including the use of low and zero emission vehicles and enabling the evidenced provision of overnight parking and rest areas, where there is likely to be demand and is appropriate to the location in line with other policies in the Plan.
- 8) Development should take account of the Local Transport Plan and Bus Service Improvement Plan.
- 9) Transport routes should consider flood evacuation routes as identified in the Strategic Flood Risk Assessment.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN2	+	+	0	0	0	+	0	+	+	+	++	+

G.8.2.1 Policy IN2 focuses on transport and accessibility and sets out a range of criteria for new development proposals to adhere to with regard to reducing the need to travel, promoting efficient travel and sustainable transport modes as well as encouraging the uptake of low and zero emission vehicles.

G.8.2.2 The proposed improvements to "*connectivity and linkages between the town centre and railway station*" and to provide for "*an attractive public realm*" are likely to encourage more people to consider choosing public transport travel options, as well as potentially enhancing the vibrancy of the town centre and nearby areas with potential indirect benefits

to the landscape/townscape character (SA Objective 8). Specific reference is made to environmental improvements to the borough's waterways, which could serve to provide active travel corridors as well as improving water quality (SA Objective 6).

- G.8.2.3 The transport improvements set out in the policy including better links to Kidsgrove Station as well as walking/cycling infrastructure and the bus network could also help to improve sustainable access to employment opportunities, local services, healthcare and schools. Minor positive impacts are likely in relation to health and wellbeing, equality and the economy (SA Objectives 9, 10 and 12).
- G.8.2.4 The policy will require proposals which generate a significant amount of travel movements to be informed by a Travel Plan, to demonstrate how the proposal will facilitate active and sustainable transport. Under this policy, development proposals will also need to show how they have considered the findings of relevant evidence base documents relating to travel including the Local Transport Plan, Local Cycling and Walking Infrastructure Plan and Bus Service Improvement Plan.
- G.8.2.5 Several of the provisions under this policy will be likely to reduce transport associated emissions, by encouraging more sustainable options. This includes infrastructure provision to support the use of electric vehicles, which are an efficient alternative to petrol and diesel-powered vehicles, primarily because they do not emit air pollutants such as PM₁₀, which can potentially have a detrimental effect on human health. Electric vehicles are likely to have significantly lower fuel costs, often saving car owners money in the long-term. By reducing the need to travel and encouraging sustainable transport options including the use of electric vehicles, this policy is likely to have a minor positive impact on climate change and air pollution (SA Objectives 1 and 2).
- G.8.2.6 Overall, a major positive impact on transport and accessibility is likely (SA Objective 11).

G.8.3 Policy IN3: Access and Parking

Policy IN3: Access and Parking

- 1) Appropriate levels of parking provision should be made in accordance with the standards contained within Appendix 3 (Parking Standards). A departure from these standards may be justified on a case by case basis, for example reduced parking levels for Town Centre residential developments where accessibility to public transport is likely to be more prevalent. Developments should also include provision for electric vehicle charging points in accordance with building regulations, with fast charging infrastructure provided for use by short stay users where appropriate.
- 2) In terms of car parking, layouts should be designed to:
 - a) reduce the visual impacts of parking on the street-scene and provide defined visitor parking on-street;
 - b) discourage the obstruction of footways by kerb parking, and parking that compromises the operation of the highway and exacerbates safety and residential amenity impacts;
 - c) ensure in-curtilage / on plot parking does not result in streets dominated by parking platforms to the front of the property or large expanses of garage doors fronting the street.
 - d) ensure any non-residential schemes have considered appropriate, fit for purpose parking measures for staff, deliveries, customers and visitors, including secure facilities for alternate transport modes, such as cycling, as well as adequate and appropriate surfacing and landscaping.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN3	+	+	0	0	0	0	0	0	+	0	+	0

- G.8.3.1 Policy IN3 outlines the appropriate measures that parking proposals will be required to follow. Car parking design layouts are detailed within the policy to ensure accessible parking that does not discourage or obstruct the footways or kerb parking in the area. Opportunities will be sought to minimise parking in areas that are highly accessible via public transport such as Newcastle-under-Lyme Town Centre.
- G.8.3.2 Under the policy, proposals are to provide for infrastructure for electric vehicles, and facilities will be secured for cycling infrastructure at non-residential schemes for staff, deliveries, customers and visitors. By encouraging sustainable transport options such as electric vehicles and cycling, this policy will be likely to have a minor positive impact on climate change, air pollution and transport and accessibility (SA Objectives 1, 2 and 11).
- G.8.3.3 Implementing standards for bicycle parking, including minimum spaces and convenient and secure locations, may help to encourage the uptake of active travel and lead to a minor positive impact on health and wellbeing (SA Objective 9).
- G.8.3.4 The policy requires that proposals include appropriate surfacing and landscaping measures, which could help to prevent adverse effects on the local landscape character. Overall, a negligible impact on landscape character is identified (SA Objective 8).

G.8.4 Policy IN4: Cycleways, Bridleways and Public Rights of Way

Policy IN4: Cycleways, Bridleways and Public Rights of Way

- 1) Development proposals will be supported which improve the number and quality of opportunities for walking, cycling and riding and create multi-user routes through development sites, particularly in areas of the Borough where it is known such opportunities are currently deficient. In such cases, the following principles should be considered:
 - a) Where new developments affect public rights of way, the public right of way should be retained.
 - b) Where development leads to the diversion of an existing right of way, a suitable alternative must be established.
 - c) Development will not normally be allowed to lead to the closure of a public right of way unless a suitable replacement can be established.
 - d) Developers will be expected to consider any unrecorded public paths that cross development sites and treat them in the same way as definitive public rights of way
 - e) To improve connectivity and ease of movement development proposals should seek, where feasible, to provide links to cycle routes, long-distance footpaths, bridleways, towpaths and rights of way networks.
 - f) Developments should seek to contribute positively to the delivery of the Rights of Way Improvement Plan for Staffordshire, the Local Cycle and Walking Infrastructure Plan and the walking, cycling and public transport aspects of the Staffordshire Local Transport Plan. It should also consider Local Transport Note 1/20 (as updated) from the Department of Transport.
- 2) Proposals will be expected to meet the following access, design and layout considerations in respect of cycleways, bridleways and public rights of way:

Policy IN4: Cycleways, Bridleways and Public Rights of Way

- a) Developers will be expected to incorporate the principles of least restrictive access in the design and layout. Developments where possible, should support active lifestyles and sustainable travel opportunities within and out with the wider site, linking to existing / new routes to support healthy and sustainable travel and leisure options.
- b) Wherever possible, any existing or alternative route alignments through development sites should run through open, landscaped areas and should:
 - a. avoid the use of estate roads;
 - b. avoid alignments enclosed by fencing with little or no surveillance from adjacent buildings;
 - c. be free from sharp bends which could provide blind spots and hiding places;
 - d. be suitably surfaced to a specification agreed with the highway authority; and
 - e. be free from barriers. Barriers should be considered as a last resort and will only be authorised where there is clear justification. The authorisation must be requested from the Highway's Authority before installation. Agreed structures will need to be the least restrictive and conform to British Standards for Gaps, Gates and Stiles.
- 3) Where paths are not enclosed, minimum widths of 2 metres for footpath and 4 metres for bridleway and cycleways should be provided. If it is necessary for the path to be enclosed by fencing, hedging or buildings, then minimum widths of 3 metres for footpaths and 5 metres for bridleways and cycleways should be provided. Advice on the type of adjacent boundary to be used should be sought from Staffordshire County Council.
- 4) New routes should have formal status and be recorded on the appropriate legal record. This will secure the long-term protection of the route and formalise responsibility for maintenance. Discussion should be held with the highway's authority at an early stage with regard to the formal recording of any new routes on the Definitive Map and Statement of Public Rights of Way for Staffordshire. This will clarify the appropriateness of any addition and formalise responsibility for the maintenance of the new routes.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN4	0	0	0	0	0	0	0	0	+	0	+	0

G.8.4.1 Policy IN4 outlines the requirements proposals will be expected to meet in regard to the design and layout of cycleways, bridleways and public rights of way (PRoW) and supports development that will improve the number and quality of opportunities for walking, cycling and riding.

G.8.4.2 Under the policy it is expected that proposals will support active lifestyles and sustainable travel opportunities, linking to existing or new routes to support sustainable travel and leisure options. Development proposals will also need to show how they have considered the findings of relevant evidence base documents relating to travel including the Rights of Way Improvement Plan for Staffordshire, the Local Cycle & Walking Infrastructure Plan and the Staffordshire Local Transport Plan. Owing to the provision of new cycle routes, PRoW and bridleways and encouraging active lifestyles, a minor positive impact is identified on health and sustainable transport (SA Objective 9 and 11).

G.8.5 Policy IN5: Provision of Community Facilities

Policy IN5: Provision of Community Facilities

- 1) Areas defined on the Policies Map, or land and buildings currently used or last used for community facilities, will be retained or serve as locations for development for such purposes. Development resulting in the loss of an existing community facility, or land allocated for such purpose, will be assessed on merit and only be permitted where:
 - a) the buildings or land are no longer fit for the purpose which they were being used due to size, layout, design and condition and that no alternative community use can be found;
 - b) there is no longer a need or demand for the facility;
 - c) where there is recognised need, alternative provision can be made on another site to the same or higher standard in terms of quantity, quality and community benefit; or
 - d) the current use will be retained and enhanced by the development of a small portion of the development site

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN5	0	0	0	+	0	0	0	0	0	+	0	0

- G.8.5.1 Policy IN5 outlines the protection of exiting community services, and outlines with circumstances in which community facilities or the land allocated for such purpose will be lost, including where there is no demand for the facility, or the building or land is no longer suitable for the purpose.
- G.8.5.2 By helping to safeguard services for use by local communities, in line with evidenced needs, a minor positive impact on equality will be likely (SA Objective 10).
- G.8.5.3 The policy states that *"land and buildings currently used or last used for community facilities, will be retained or serve as locations for development for such purposes"*. The re-use of previously developed land will help to conserve undeveloped land within the borough and protect valuable soil resources. A minor positive impact is identified for natural resources (SA Objective 4).

G.8.6 Policy IN6: Telecommunications Development

Policy IN6: Telecommunications Development

- 1) The Council supports and encourages the expansion of electronic communications networks, including telecommunications and high speed broadband. Proposals for the installation of new telecommunications equipment should demonstrate that:
 - a) Equipment/site sharing is not feasible and that telecommunications apparatus cannot be sited on an existing building or other appropriate structure where this represents the preferable townscape and landscape solution
 - b) The size of the apparatus is kept to the minimum necessary to achieve its purpose and every effort, including landscaping measures, has been made to minimise the visual impact of the proposal on its setting

Policy IN6: Telecommunications Development

- c) The telecommunication apparatus is positioned so as to minimise its impact on the external appearance of the building or structure to which it is attached, and is of a suitable colour which minimises visual impact and enables it to merge into the background
- d) The apparatus is not used primarily as a means of advertising
- e) The apparatus would not harm the significance of a designated heritage asset.
- 2) For new housing and commercial developments:
 - a) Connectivity to the fastest technically available broadband network (Gigabit broadband or as exceeded) should be provided unless it can be clearly demonstrated that this is not possible
 - b) Telecommunications infrastructure and connections must be designed into and integrated within any new development. Works will need to be carefully managed and coordinated between different providers to minimise disruption to highways and residential amenity and ensure the safety of all users
 - c) Wherever feasible, new telecommunications infrastructure such as transmission equipment should be placed underground
 - d) Essential existing telecommunications infrastructure will be protected unless it is no longer required or can be adequately relocated and/or replaced.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN6	+	+	0	0	0	0	0	0	0	0	0	+

- G.8.6.1 Policy IN6 supports and encourages the expansion of telecommunications and high-speed broadband and outlines the requirements that proposals for the installation of new telecommunications equipment will need to follow.
- G.8.6.2 Under the policy, new housing and commercial developments will be connected to the fastest technically available broadband network available, unless it is clearly demonstrated that it is not possible. The provision of new broadband networks will facilitate hybrid working and could reduce the need to travel, therefore reducing transport related emissions and having a minor positive impact on climate change and air quality (SA Objective 1 and 2), as well as benefits to the local economy (SA Objective 12).
- G.8.6.3 Under the policy it is required that the installation of new telecommunications equipment has minimal impact on the landscape and setting and will not harm an element which contributes to the significance of a designated heritage asset. Therefore, a negligible impact is identified for heritage assets and the local landscape (SA Objective 7 and 8).

G.8.7 Policy IN7: Utilities

Policy IN7: Utilities

- 1) Development proposals should demonstrate sufficient existing infrastructure capacity for surface water disposal, water supply, wastewater treatment, telecommunications, gas and electricity, highways, social and green infrastructure to meet forecast demands arising from them and that appropriate connections can be made.

Policy IN7: Utilities

- 2) Major development schemes will require a comprehensive site-wide Utilities Masterplan, outlining the phasing of utility provision throughout the construction process and demonstrating coordinated early engagement with infrastructure providers
- 3) Development proposals should not result in unacceptable encroachment upon, or compromise the integrity of, existing utilities infrastructure, including telecommunications infrastructure. Developers should actively seek opportunities to safeguard and enhance the provision of utilities within the Borough.
- 4) Within sensitive areas such as Conservation Areas, new utility services should be laid underground wherever possible. Where surface level equipment is unavoidable, it should be carefully sited and screened to minimise visual intrusion.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
IN7	+	0	+	0	+	+	0	0	+	0	0	0

- G.8.7.1 Policy IN7 outlines the requirements of proposals to not encroach upon or comprise the integrity of existing utility infrastructure and further requires major development proposals to be accompanied with a site-wide Utilities Masterplan, outlining utility provision.
- G.8.7.2 Under the policy development proposals should demonstrate sufficient capacity for "*water disposal, water supply, wastewater treatment, telecommunications, gas and electricity, highways, social and green infrastructure*". The provision of social and green infrastructure will provide local residents with associated health benefits from access to open green space. Furthermore, the provision of GI, will also help to reduce the risk of surface water flooding, where the GI will capture and store rainwater for reuse, and alongside wastewater treatment utilities will help to improve water quality and prevent water pollution. A minor positive impact is identified for SA Objectives 5, 6 and 9.
- G.8.7.3 Furthermore, ensuring adequate water and wastewater infrastructure is available to serve new development, where evidenced in liaison with water companies, will help to reduce the potential for associated adverse effects on aquatic biodiversity in the event of extreme weather events. There is potential for the policy to lead to a minor positive impact on climate change and biodiversity (SA Objectives 1 and 3).
- G.8.7.4 There is likely to be a negligible impact on landscape (SA Objective 8), where new utilities in sensitive areas will not be expected to cause any adverse impacts.

G.9 Sustainable Environment

G.9.1 Policy SE1: Pollution and Air Quality

Policy SE1: Pollution and Air Quality

- 1) Development proposals that are likely to result in detrimental impacts on pollution, including on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. Development proposals should incorporate strategies that prevent or minimise pollution. Development proposals should:
 - a) Not lead to significant adverse effects on public health, the environment, or amenity from polluting emissions or odours.
 - b) Not result in negative impacts on air quality within areas designated as Air Quality Management Areas (AQMA), the designation of a new AQMA, or compromise the implementation of the North Staffordshire Local Air Quality Plan and Newcastle-under-Lyme Air Quality Action Plan.
 - c) Consider the cumulative effects of emissions from proposed development alongside other and existing sources of air pollution in the vicinity.
 - d) Demonstrate that mitigation measures can be achieved to reduce pollution, both during construction and operational phases of development. Measures should prioritise those that directly address air quality concerns, such as:
 - Sustainable and active transport options: This includes promoting walking, cycling, public transport, and reducing the need for travel.
 - Low-emission technologies: This includes utilising clean technologies and innovations to reduce emissions from various sources.
 - Enhancement of green infrastructure: This includes utilising natural solutions like green spaces and vegetation to absorb air pollutants.
 - e) Include appropriate noise attenuation measures (from development that will likely generate significant noise levels) to reduce the impact on the surrounding land uses, existing or proposed and sensitive receptors to acceptable levels in accordance with relevant noise standards and Government guidance.
 - f) Ensure that where external lighting is required, a lighting scheme will suitably address any security issues whilst ensuring any light spill and potential glare and impact on the night sky is minimised through the control of light direction and levels, particularly in residential and commercial areas, areas of wildlife interest or the visual character of historic buildings and rural landscape character.
 - g) Under the agent of change principle, if new development or uses are to be introduced near a pre-existing business, it is the responsibility of the developer to ensure solutions to address and mitigate noise and/or light are put forward as part of proposals.
- 2) A substantial improvement to air quality will be sought in the Borough by:
 - a) Reducing emissions derived from vehicular travel by minimising the need to travel and maximising opportunities for more sustainable modes of travel including walking, cycling and public transport.
 - b) Promoting the use of low carbon emission vehicles and facilitating the provision for electric charging facilities
 - c) Identifying opportunities to protect and enhance ecosystems and the green infrastructure network to assist in the absorption of air pollutants
- 3) Development proposals must implement effective dust control measures during construction, such as:
 - a) Regularly watering exposed soil and stockpiles.
 - b) Covering haul roads and using wheel washing facilities.
 - c) Utilising dust suppression systems during demolition and excavation activities.
 - d) Implementing windbreaks or temporary enclosures around construction sites.
- 4) Developers are encouraged to utilise low-emission construction equipment and machinery, such as electric or hybrid vehicles, to minimise air pollution during construction activities.

Policy SE1: Pollution and Air Quality

- 5) For major developments, a Construction Management Plan (CMP) will be required to minimise the impacts of construction. This should include the mitigation of construction logistics and environmental impacts including impacts on local air quality. The Plan should outline measures that reduce air quality and noise impacts on the surrounding area and encourage sustainable deliveries.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE1	+	+	+	0	0	+	0	+	+	+	+	0

- G.9.1.1 Policy SE1 sets out the requirement to reduce the potential for adverse effects in regard to pollution from air quality, light, noise and odour issues. The policy requires proposals to “*demonstrate that mitigation measures can be achieved to reduce pollution, both during construction and operational phases of development*”.
- G.9.1.2 Air pollution is a significant concern internationally and locally. This policy will help to ensure that the proposed development prevents worsening of air quality within existing AQMAs and is in line with the findings of the local and regional air quality strategies, including the borough’s Air Quality Action Plan. The policy also seeks to ensure that the cumulative effects are considered including surrounding sources of air pollution.
- G.9.1.3 Policy SE1 further sets out the intention to improve the borough’s air quality by promoting the uptake of low emission vehicles, improving sustainable transport provision and reducing the need to travel, as well as ensuring that development proposals identify opportunities to protect and enhance green infrastructure with multi-functional benefits. Overall, the policy is likely to help protect, and where possible improve, air quality across the borough, and as such, have a minor positive impact on air (SA Objective 2). A minor positive impact on climate change could also be achieved, through reducing emissions (SA Objective 1). A minor positive impact on water quality could also be achieved, through the protection and enhancement of GI, that will provide water filtration and storage (SA Objective 6). By seeking to ensure development is located in areas which encourage local journeys and active travel, a minor positive impact on transport and equality, including potential benefits in terms of access to local services, is likely (SA Objectives 10 and 11).
- G.9.1.4 By limiting the impacts of development on local air quality and ensuring that development proposals will not expose residents to harmful levels of air pollution, alongside promoting active travel and green infrastructure, this policy will also be expected to have a minor positive impact on human health (SA Objective 9). This is due to the likely benefits in terms of encouraging active lifestyles.
- G.9.1.5 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy will help to reduce air pollution and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Coupled with the proposed conservation and enhancement of GI networks, this could potentially have a minor positive

impact on biodiversity, which may otherwise be threatened by the impacts of air pollution (SA Objective 3).

- G.9.1.6 Policy SE1 also aims to prevent adverse impacts in terms of light pollution, and maintain dark skies. This could help to conserve tranquillity in rural areas, with potential for a minor positive impact on the landscape (SA Objective 8).

G.9.2 Policy SE2: Land Contamination

Policy SE2: Land Contamination

- 1) Development proposals on land that is contaminated, or suspected of being contaminated (as defined under Part IIA of the Environmental Protection Act 1990), will not be permitted unless:
 - a) An adequate site investigation survey (prepared by a competent person) demonstrates that land contamination issues have been fully addressed or can be addressed through the development, ensuring the site is suitable for the proposed use and safe for human health and the environment. This assessment should follow the risk assessment framework outlined in the Contaminated Land Statutory Guidance and consider potential impacts on all relevant receptors, including human health, controlled waters, and ecological systems.
 - b) Land contamination assessments should be conducted in accordance with relevant industry standards and guidelines, such as the Contaminated Land Statutory Guidance and the Land Contamination Risk Management (LCRM) framework. The assessment should clearly identify the sources, pathways, and receptors of contamination, evaluate the risks to human health, controlled waters, and ecological systems, and propose appropriate remediation strategies.
 - c) The land contamination assessment should consider the site's historical use and any potential sources of contamination from surrounding land uses. This includes reviewing historical maps, aerial photographs, and environmental databases, as well as consulting with relevant agencies and stakeholders.
 - d) A phased approach to site investigations may be adopted, starting with a desk study and preliminary risk assessment, followed by intrusive investigations, if necessary, to determine the extent and nature of contamination.
 - e) Remediation is undertaken to levels that ensure the site is suitable for its proposed use and will not pose an unacceptable risk to human health, the natural environment, or water quality, in accordance with relevant guidance and standards. Remediation methods should be selected based on the type and extent of contamination, site-specific conditions, and the intended future use of the land. Acceptable remediation methods may include, but are not limited to, excavation and disposal, soil washing, bioremediation, and in-situ treatment. Flood resilience measures should also be considered.
 - f) A long-term monitoring plan is established to ensure the effectiveness of the remediation measures and identify any potential future risks. The monitoring plan should be developed in consultation with the Borough Council and consider the specific contaminants of concern, the chosen remediation methods, and the potential for future changes in land use or environmental conditions.
 - g) Financial provisions are in place to guarantee the completion of necessary remediation works. This may include requiring developers to provide financial guarantees, bonds, or other mechanisms to ensure that sufficient funds are available to cover the costs of remediation, even in the event of unforeseen circumstances. Where appropriate, the Council may seek financial contributions towards the cost of remediation as part of planning obligations or through the Community Infrastructure Levy (CIL) where such a regime has been adopted by the Council.
 - h) A long-term monitoring and management plan must be developed for remediated sites to track the effectiveness of remediation measures, identify any potential future risks, and ensure the ongoing protection of human health and the environment.
 - i) The monitoring and management plan should specify the monitoring parameters, sampling locations, and frequency of monitoring based on the nature of the contamination and the chosen remediation methods.
 - j) Regular monitoring reports should be submitted to the Borough Council, and the monitoring and management plan should be reviewed and updated as necessary to reflect changing circumstances or new information.
 - k) All applications within a Coal Mining Referral Area, unless on the Coal Authority's Exemptions List, should prepare a coal mining risk assessment to identify and mitigate any risks from the legacy of

Policy SE2: Land Contamination

coal mining in the area. This assessment should consider potential hazards such as mine shafts, subsidence, and gas emissions, and propose appropriate mitigation measures to ensure the safety of the development.

- I) Land contamination assessments should consider the potential for flood events to exacerbate contamination risks, as identified in the Strategic Flood Risk Assessment.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE2	0	0	+	+	0	+	0	0	+	0	0	0

- G.9.2.1 Policy SE2 requires development proposals that include contaminated land to follow specific guidance in order for development to be permitted, including adequate site investigation surveys, land contamination assessments and monitoring and management plans should be prepared to identify any future risks.
- G.9.2.2 The use of contaminated land for development could potentially help to reduce the amount of development on undeveloped land; therefore, this policy could potential help prevent the loss of ecologically or agriculturally valuable soil resources. A minor positive impact is identified on natural resources (SA Objective 4).
- G.9.2.3 Policy SE2 aims to ensure that remediation and mitigation measures are carried out before development on contaminate land can be supported. This will be likely to have a minor positive impact on biodiversity, human health and pollution, including water pollution (SA Objectives 3, 6 and 9).
- G.9.2.4 Under the policy, land contamination assessments should consider the historic use of the land, which will ensure that historic assets are conserved. A negligible impact is identified on cultural heritage (SA Objective 7).

G.9.3 Policy SE3: Flood Risk Management

Policy SE3: Flood Risk Management

- 1) All development should follow the sequential approach to determining the suitability of land for development, direct new development to areas at lowest risk of flooding and where necessary apply the exception test, taking account of all sources of flooding identified in the Strategic Flood Risk Assessment.
- 2) A Flood Risk Assessment (FRA) is required for all development proposals:
 - a) Located within Flood Zones 2, 3, or 3b, as designated in the latest Strategic Flood Risk Assessment (SFRA) or latest Environment Agency mapping.
 - b) Located in Flood Zone 1 on sites of 1 hectare or more;
 - c) Located within Flood Zone 1 where the latest Strategic Flood Risk Assessment identifies a risk of flooding from rivers, watercourses, or other sources.
 - d) Within Strategic Flood Risk Assessment designated Critical Drainage Areas
 - e) That increase the vulnerability classification, even within Flood Zone 1, where other sources of flood risk are identified in the latest Strategic Flood Risk Assessment.

Policy SE3: Flood Risk Management

- f) Within areas identified as susceptible to groundwater flooding on the groundwater emergence map in the Strategic Flood Risk Assessment.
- 3) All Flood Risk Assessments should:
 - a) Assess all sources and forms of flooding in accordance with the SFRA guidance.
 - b) Provide mitigation measures designed in line with the SFRA's floodplain compensation and climate change modelling.
 - c) Ensure no increase in flood risk on-site or elsewhere, including downstream/upstream receptors, existing development, and adjacent land.
 - d) Demonstrate no increase in fluvial and surface water discharge rates or volumes during storm events up to and including the 1 in 100-year event (with an allowance for climate change).
 - e) Include detailed modelling of any ordinary watercourses within or adjacent to the site, where appropriate, to define areas at risk and model the effect of climate change.
 - f) Provide an assessment of residual flood risk with appropriate mitigation strategies.
 - g) Collaborate with appropriate providers to assess sewer flood risk, particularly for proposals located in areas with a history of sewer flooding or near existing sewer infrastructure.
 - h) Consider the potential impacts of climate change on the flood risk over the lifetime of the development, taking into account climate change allowances in the Strategic Flood Risk Assessment
- 4) Development proposals in high-risk areas, as identified by the SFRA, may be subject to additional requirements, including:
 - a) Minimum finished floor levels based on SFRA recommendations.
 - b) An 8-metre maintenance easement along main rivers.
 - c) Specific measures to promote river and watercourse naturalisation, in line with SFRA recommendations and guidance
- 5) Where development is proposed in areas with potential groundwater flood risk, as identified by the Strategic Flood Risk Assessment or other sources, the Flood Risk Assessment should include a groundwater assessment, especially if the site is located within a Groundwater Source Protection Zone or on contaminated land. This assessment should consider factors such as groundwater levels, soil permeability, and the potential for interaction with surface water flooding.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE3	+	0	0	0	++	+	0	0	0	0	0	0

- G.9.3.1 Policy SE3 sets out the Council's approach to managing the risk of flooding and water resources within the borough. The policy will ensure that development proposals are informed by flood risk assessments, where appropriate, and sets out criteria that must be adhered to for different development scenarios in accordance with the Strategic Flood Risk Assessment (SFRA).
- G.9.3.2 Overall, the policy is expected to ensure that development proposals will not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on flooding will be anticipated (SA Objective 5).
- G.9.3.3 The policy will also provide benefits to water quality by ensuring development with potential groundwater flood risk will include a groundwater assessment, especially where a site is located within a Groundwater Source Protection Zone or on contaminated land. The policy could lead to a minor positive impact on water quality (SA Objective 6).

- G.9.3.4 Through seeking to ensure that development proposals take into account the impact of climate change on flood risk in both the present and future the policy could lead to a minor positive impact on adaptation to climate change (SA Objective 1).

G.9.4 Policy SE4: Sustainable Drainage Systems

Policy SE4: Sustainable Drainage Systems

- 1) Development proposals should manage and discharge surface water through a sustainable drainage system. Smaller developments may be exempt from full Sustainable Drainage Systems (SuDs) implementation but should still incorporate appropriate measures to manage surface water runoff sustainably, such as the use of permeable paving, rain gardens, or soakaways, wherever feasible.
- 2) Development proposals should prioritise the following approaches for surface water management in this order of preference:
 - a) Infiltration: Discharge of rainwater into the ground through infiltration techniques such as soakaways.
 - b) Attenuated Discharge to a Surface Water Body: Discharge of rainwater to streams, rivers, lakes, canals (with permission), or other surface water features, ensuring minimal impact on flow rates.
 - c) Attenuated Discharge to a Surface Water Sewer, Highway Drain, or Another Drainage System: Discharge to existing public surface water drainage systems, but only after exploring infiltration and surface water body discharge options.
 - d) Attenuated Discharge to a Combined Sewer: Discharge to a combined sewer system that collects both surface water and foul sewage (wastewater). This should only be considered as a last resort after exhausting all other options above.

Departures from this hierarchy should be fully justified and may require additional mitigation measures.

- 3) A SuDS drainage strategy should be submitted with the planning application. This strategy should:
 - a) Demonstrate a clear understanding of site-specific conditions including soil permeability, groundwater levels, and contamination risks (which may influence SuDS suitability).
 - b) Design SuDS solutions appropriate to the scale and nature of the development, following the surface water hierarchy and prioritising infiltration.
 - c) Provide calculations for runoff rates, attenuation volumes, and demonstrate how the system will manage storm events up to and including the 1 in 100-year event with climate change allowances.
 - d) Address the potential impacts of climate change on the long-term performance of SuDs and incorporate adaptation measures, where appropriate.
- 4) Early engagement with the Lead Local Flood Authority (LLFA) and United Utilities is important to explore SuDS feasibility and design. For sites with potential canal discharge, the Canal and Rivers Trust should be consulted.
- 5) SuDS proposals must align with the latest SFRA recommendations, LLFA guidance, and relevant SuDS design standards.
- 6) A detailed maintenance plan for the approved SuDS system should be submitted, addressing ongoing responsibility, inspection regimes, and funding mechanisms for the SuDS's lifespan.
- 7) The maintenance plan should outline the long-term funding mechanism for the SuDS scheme. Options may include:
 - a) Establishment of a dedicated management company: This company would be responsible for ongoing maintenance, funded through service charges levied on residents or businesses within the development.
 - b) Community-based stewardship: Explore opportunities for community involvement in SuDS maintenance, such as volunteer groups or partnerships with local organisations.
 - c) Financial contributions from developers: Developers may be required to provide financial contributions towards the long-term maintenance of the SuDS, secured through planning obligations or a sinking fund.
 - d) Pumped drainage systems should be minimised. Proposals should prioritise gravity-based, naturally functioning SuDS solutions wherever possible.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE4	+	0	+	0	+	+	0	0	0	0	0	0

G.9.4.1 Policy SE4 outlines the requirements that development proposals will need to follow for surface water management, including the provision of sustainable drainage systems (SuDS).

G.9.4.2 The policy promotes the use of SuDS to manage surface water run-off and to reduce the risk of surface water flooding, and through ensuring SuDS are designed in line with relevant guidance, such as the SFRA and Staffordshire SuDS Handbook¹⁴, the policy will encourage opportunities to be sought for integrating multi-functionality. This could include benefits to water quality, biodiversity and amenity interest through the integration into the wider blue and green infrastructure network and natural management of flood water. As a result, this policy is expected to have minor positive impacts in relation to adapting to the effects of climate change, surface water flooding, biodiversity and water quality (SA Objectives 1, 3, 5 and 6).

G.9.5 Policy SE5: Water Resources and Water Quality

Policy SE5: Water Resources and Water Quality

- 1) Development proposals should demonstrate a commitment to sustainable water management, the mitigation of adverse impacts on water quality, and contribute positively towards the objectives of the Water Framework Directive (WFD). This includes preventing pollution risks to groundwater, surface water, and associated ecosystems, and ensuring that development does not compromise the existing ecological status of water bodies or prevent the achievement of WFD objectives.
- 2) Development proposals located within designated nitrate vulnerable zones or in close proximity to sensitive water bodies should consider nitrate neutrality. This means that the development will not result in any net increase in nitrate levels within the affected water environment. Developers should consult with the Environment Agency and relevant water companies to determine the appropriate measures to achieve nitrate neutrality, such as on-site mitigation through sustainable drainage systems or off-site offsetting through habitat creation or restoration projects.
- 3) Where applicable, development within Groundwater Source Protection Zones (SPZs) will only be permitted if accompanied by a comprehensive risk assessment demonstrating no unacceptable impacts on groundwater resources or public water supplies. The assessment should be conducted in consultation with the Environment Agency and relevant water companies.
- 4) Development proposals must consider the capacity limitations outlined in the Water Cycle Study (WCS). Where constraints are identified, developers must work with the Environment Agency and water companies to implement appropriate mitigation measures.
- 5) Development should seek opportunities to enhance watercourses (rivers, streams, and canals) and their associated habitats, contributing positively to local biodiversity and green infrastructure goals.
- 6) Development proposals should, where possible, incorporate water reuse strategies, such as greywater recycling and rainwater harvesting systems, to reduce demand on potable water supplies and promote sustainable water management. The feasibility and appropriateness of these techniques

¹⁴ Staffordshire County Council (2017) Sustainable Drainage Systems (SuDS) Handbook. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/767/appendix-g-suds-handbook-developer-proforma> [Date accessed: 31/05/24]

Policy SE5: Water Resources and Water Quality

should be assessed on a site-by-site basis, taking into account factors such as the scale and type of development, local water availability, and the potential for integration with other sustainable drainage measures.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE5	0	0	+	0	0	+	0	0	+	0	0	0

G.9.5.1 Policy SE5 seeks to conserve, and where possible enhance, the quality of watercourses, aquatic habitats and groundwater, ensuring development takes into account the objectives of the Water Framework Directive¹⁵ and considers capacity limitations that are outlined within the Water Cycle Study¹⁶, ensuring adequate water supply and management of water resources.

G.9.5.2 The protection or improvement of water quality will be likely to have a positive impact on the local ecological network and the health of residents. Good water quality is an essential health requirement for local residents, as well as local fauna and flora. Furthermore, the policy will help to ensure that the quality of waterbodies including those downstream associated with Habitats site designations are protected. Under this policy, development proposals are encouraged to utilise sustainable management strategies such as greywater recycling and rainwater harvesting systems, which could reduce the pressure on water suppliers and result in the sustainable reuse of water. Additionally, development proposals located within nitrate vulnerable zones or located in close proximity to a sensitive water body should consider nitrate neutrality and consult with the Environment Agency to determine appropriate measures such as on-site mitigation strategies. As such, this policy is expected to have a minor positive impact on biodiversity, water quality and human health (SA Objectives 3, 6 and 9).

G.9.6 Policy SE6: Open Space, Sports and Leisure Provision

Policy SE6: Open Space, Sports and Leisure Provision

- 1) The Council will work with developers and other stakeholders to provide, enhance and maintain open space across the Borough to meet the needs of existing and future residents and aid delivery of the Council's strategy for Carbon Capture Areas. This policy applies to open space, sports and recreational buildings and land, including playing fields.
- 2) The direct provision of or contributions towards sports and leisure provision linked to new development will be sought in line with the Council's Playing Pitch Strategy (2019), Stage E PPS Monitoring Update and the Sports England Sport Pitch Calculator. Leisure provision should also refer to the Retail and Leisure Study.

¹⁵ Water Framework Directive (2017). Available at: www.legislation.gov.uk/uksi/2017/407/contents [Date accessed: 23/05/24]

¹⁶JBA Consulting (2024). Newcastle-under-Lyme Borough Council. Local Plan Evidence base: Water Cycle Study: Phase 2. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base [Date accessed: 24/07/24]

Policy SE6: Open Space, Sports and Leisure Provision

- 3) The provision of open space will be sought on a site-by-site basis, taking account of the location, type, and scale of the development:
 - a) for major developments provision of open space should be to a standard of at least 4ha per 1,000 population comprising:
 - 0.125 hectares of Allotments
 - 0.98 hectares of Amenity Greenspace
 - 1.8 hectares of Natural and Semi-Natural Greenspace
 - 0.8 hectares of Parks and Gardens
 - 0.35 hectares of Provision for Children and Teenagers
 - b) where the proposal is for the redevelopment of a previously developed site which includes existing dwellings, the net increase in residents will be calculated so that only the additional pressure on open spaces is taken into account;
 - c) provision, where possible, should be met on site. Exceptions will be where the site or development is not of sufficient size to make onsite provision feasible or where it is preferable to seek contributions to enhancing a specific existing facility in the local area. Any off-site contribution should be of equivalent value to on-site provision;
 - d) the layout and equipment provided is to a recognised specification at an early stage of the development;
 - e) major development schemes will need to demonstrate how the management and maintenance of additional open space provision will be provided for and will be secured by condition / planning obligation;
 - f) Major development schemes should also make reference to Natural England's Green Infrastructure Framework and the accessible greenspace standards included in the Framework;
 - g) For smaller developments of up to 10 dwellings a financial contribution to off-site provision of open space may be required depending on the scope of provision on-site capable of being delivered. Off-site provision must be well located in relation to the site making a financial contribution.
 - h) This requirement relates to the net area of usable open space which does not include associated infrastructure such as access points, pedestrian or cycle paths, parking, ancillary buildings, landscaping and safety margins.
- 4) Proposals which result in the loss of green /open space, sports and recreational buildings and land will only be permitted where:
 - a) it is demonstrated that the open space, buildings or land to be surplus to requirements, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable and accessible location; or
 - b) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss; or
 - c) The proposed development is ancillary to the main use of the site and strengthens its function.
- 5) Proposals that protect or enhance Local Green Space designations, designated through Neighbourhood Plans, will be permitted. Proposals for appropriate development on Local Green Spaces, will be permitted in accordance with the NPPF.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE6	0	0	+	0	0	0	0	+	++	+	0	0

G.9.6.1 Policy SE6 aims to ensure the protection of existing open spaces, sports and leisure provisions in the borough and support the provision, enhancement and maintenance of

new provisions in line with the identified local needs. The policy will provide opportunities for recreation and leisure, and help to encourage outdoor exercise and space for reflection, with potential for a major positive impact on health and wellbeing (SA Objective 9) and a minor positive impact on equality (SA Objective 10).

- G.9.6.2 The provision, enhancement and maintenance of open spaces and other facilities under this policy will help to ensure residents have access to a diverse range of natural spaces and habitats. This could help to create attractive places to live and strengthen the sense of place. By increasing the provision of open spaces across the borough, this policy could potentially lead to a minor positive impact for local biodiversity and the landscape (SA Objectives 3 and 8).

G.9.7 Policy SE7: Biodiversity Net Gain

Policy SE7: Biodiversity and Geodiversity

- 1) Development proposals for one or more dwellings or non-residential buildings will be permitted provided that they are designed to deliver at least a 10% measurable net gain of biodiversity habitat using the relevant statutory Biodiversity Net Gain (BNG) Metric. Provision of BNG should be secured and maintained for a period of 30 years.
- 2) Proposals for BNG should consider opportunities to form part of, connect to or support restoration of the Local Nature Recovery Network and implement opportunities identified in the Local Nature Recovery Strategy.
- 3) BNG should be delivered in accordance with the biodiversity net gain hierarchy set out in national policy:
 - a) BNG should primarily be delivered on-site (within the red line boundary of a development site);
 - b) If it is not feasible to achieve all BNG required on-site, provision can be through a mixture of on-site and off-site (on land as close to the development site as possible);
 - c) As a last resort, if BNG cannot be delivered on-site or off-site statutory biodiversity credits must be bought from the government.
 - d) Applicants can combine all 3 options but must follow the steps in sequential order
- 4) In designing the development to achieve the measurable net gain, the following principles will need to be adhered to;
 - a) apply the mitigation hierarchy (set out in Policy SE8 Biodiversity and Geodiversity);
 - b) avoid losing biodiversity that cannot be offset elsewhere, such as irreplaceable habitats;
 - c) prioritise habitat creation, enhancement and achieving the best outcome for biodiversity;
 - d) where possible, maximise the wider sustainability benefits.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE7	+	+	++	0	+	0	0	0	+	0	0	0

- G.9.7.1 Policy SE7 demonstrates the Council's commitment to Biodiversity Net Gain (BNG) and sets out principles that development proposals will need to follow. The policy sets out the requirement to follow the mitigation hierarchy, ensuring that loss of designated nature conservation and geological sites is avoided, mitigated or as a last resort, compensated for.

- G.9.7.2 Under the policy biodiversity will be enhanced, where proposals will be required to deliver an overall measurable net gain in biodiversity. Achieving successful BNG is a requirement that relies on long term, effective and well-funded strategies. Policy SE7 also encourages BNG to link with the emerging Nature Recovery Network and Local Nature Recovery Strategy, ensuring that proposals help to contribute towards the conservation and enhancement of the borough's biodiversity. Overall, a major positive impact on biodiversity, flora, fauna and geodiversity is identified (SA Objective 3).
- G.9.7.3 The protection of biodiversity assets and enhancement of biodiversity through BNG will also be expected to have secondary benefits across a number of SA Objectives, including in relation to human health. Access to a diverse range of natural habitats is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. Furthermore, the implementation of BNG and associated GI within development sites is likely to contribute towards mitigating adverse impacts on climate change, air quality and flooding. Minor positive impacts have therefore been identified for SA Objectives 1, 2, 5 and 9.

G.9.8 Policy SE8: Biodiversity and Geodiversity

Policy SE8: Biodiversity and Geodiversity

- 1) All development should ensure the conservation, enhancement and restoration of biodiversity and geodiversity, avoiding any adverse impacts on condition, and where relevant recovery, of all types of nature conservation sites, habitats, species and components of ecological networks or geological interests including:
 - a) Internationally designated sites (SPA, SAC, Ramsar);
 - b) Sites of Special Scientific Interest (SSSIs);
 - c) Legally protected species;
 - d) Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs);
 - e) Priority habitats and species listed in the national and local Biodiversity Action Plans;
 - f) Habitats and species of principal importance for the conservation of biodiversity in England;
 - g) Biodiversity Opportunity Areas (BOA) / Nature Recovery Networks (NRN);
 - h) Irreplaceable habitats including ancient woodlands and ancient and veteran trees;
 - i) Trees, woodlands and hedgerows; and
 - j) Wildlife corridors and stepping-stones
- 2) Where development has the potential for a likely significant effect on any international designated site (as defined by the Habitats Regulations), either alone or in combination, it would only be permitted if it can demonstrate through a habitats regulations assessment that that there will be no adverse impacts upon the integrity of the designated site, taking into consideration the sites conservation objectives, either alone or in-combination with other plans and projects and the adverse impacts on site integrity can be mitigated. Where this cannot be met, development would only be considered if it meets requirements set out in the Habitats Regulations (as updated).
- 3) Development proposals on or affecting nationally designated sites will only be supported where the benefits of the development clearly outweigh harm to the nature conservation value of the site.
- 4) Development proposals on or affecting locally designated sites will only be supported where it can be demonstrated that the need for the development outweighs the harm to the nature conservation value or geological value of the site.
- 5) In accordance with the mitigation hierarchy, all development proposals must make sure that significant harm to biodiversity and geodiversity is:
 - a) Firstly avoided; then
 - b) If impacts cannot be avoided, identify and implement measures to acceptably mitigate these impacts; then

Policy SE8: Biodiversity and Geodiversity

- c) Finally, and as a last resort, if impacts are unavoidable and cannot be acceptably mitigated, compensation measures should be provided. This may include off-site provision where adequate on-site provision cannot be made.
- 6) Development resulting in the loss of or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
- 7) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring of the effectiveness of these measures.
- 8) The weight attributed to the protection of nature conservation interests will be commensurate with their status and significance, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, robust evidence will be required to demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought.
- 9) The Council will, where appropriate, expect ecological surveys to be undertaken in support of planning applications. These must be carried out by a suitably qualified person and consistent with nationally accepted standards and guidance (BS 42020: Biodiversity – Code of Practice for planning and development; and CIEEM (Chartered Institute of Ecology and Environmental Management) Ecological Report Writing guidance) or as updated / replaced.
- 10) Development proposals which have an impact on international, national, locally designated habitats will require the following assessments:
 - a) Proposals which have an impact on international sites will require a Habitats Regulations Assessment (HRA) to determine the potential for likely significant effects. Where likely significant effects may occur, development proposals will be subject to Appropriate Assessment.
 - b) Proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an Environmental Impact Assessment
 - c) Proposals considered likely to have a significant impact on local sites will be required to assess the impact by means of an Ecological Impact Assessment.
- 11) Development proposals will be expected to promote site permeability for wildlife and avoid the fragmentation of wildlife corridors, incorporating features to encourage biodiversity, retain and where possible enhance existing features of nature conservation value on site. Existing ecological networks should be identified and maintained to avoid habitat fragmentation, and ecological corridors including water courses should form an essential component of green infrastructure provision in association with new development to ensure habitat connectivity.
- 12) Where development is proposed within, or adjacent to, a biodiversity opportunity area, biodiversity surveys and a report will be required to identify constraints and opportunities for biodiversity enhancement. Development which would prevent the aims of a Biodiversity Opportunity Area from being achieved will not be permitted.
- 13) Development proposals which are likely to have a significant adverse impact on a local nature reserve will not be permitted except where the reasons for or benefits of the proposed development outweigh the impact of the development.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE8	+	+	++	+	+	+	0	0	+	0	0	0

G.9.8.1 Policy SE8 ensures that development conserves, enhances and restores biodiversity and geodiversity. The policy requires full mitigation at any development proposal likely to have significant effect on an international nature conservation designation, including proposed development sites.

- G.9.8.2 It is expected that this policy will help to protect important biodiversity and geodiversity assets in the borough from adverse impacts caused by development. Additionally, all development proposals are required to ensure enhancement of biodiversity and geodiversity and should identify existing ecological networks, making sure these valuable networks are maintained to avoid habitat fragmentation and where possible enhance existing features of nature conservation value. Overall, a major positive impact on biodiversity, flora, fauna and geodiversity is identified (SA Objective 3).
- G.9.8.3 Vegetation and GI provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants and the protection of ecologically valuable soil resources from erosion. The protection and enhancement of biodiversity features provided by this policy, including the promotion of "*site permeability for wildlife*", habitat connectivity and contributions towards green and blue infrastructure networks, will be likely to help protect and enhance these essential ecosystem services within the borough including within urban areas. This policy could potentially result in a minor positive impact on climate change, air quality, natural resources, flooding and water quality (SA Objectives 1, 2, 4, 5 and 6).
- G.9.8.4 The protection of biodiversity assets will also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. This policy is therefore likely to have a minor positive impact on human health (SA Objective 9).

G.9.9 Policy SE9: Historic Environment

Policy SE9: Historic Environment

- 1) All development proposals should respond positively to local character and distinctiveness and should conserve and, where possible, enhance the significance of all heritage assets and their settings and, where possible, be designed so as to better reveal their significance. Specifically, proposals will be expected to:
 - a) Take account of the immediate and wider setting, including the grain, height and mass of surrounding development (in particular, historic development) and the visual impact of proposals on views and the character and setting of settlements.
 - b) Be informed by the historic landscape character mapping provided by the Staffordshire Historic Landscape Characterisation Project in accordance with Policy SE10 (Landscape).
 - c) Deliver a high-quality development that includes architectural design, features and detailing distinctive to the local area. Materials should be high quality and reflect those traditionally characteristic of the area, such as timber-framing, local stone, red brick, Staffordshire blue brick and clay roof tiles. Where a proposal is of a contemporary or innovative design, this part of the policy will still be expected to be complied with in relation to some elements of the scheme, to help integrate the development with the local area.
 - d) Where development is proposed within the urban area of Newcastle-under-Lyme – Take account of the character and significance of any Historic Urban Character Areas (HUCAs) affected by the proposals, including any important positive, negative or neutral architectural or historic elements or features within those areas, along with any recommendations for the affected HUCAs, as identified in the Newcastle-under-Lyme Historic Character Assessment (2009).
 - e) Where development is proposed within, or within the setting of, a designated Conservation Area – Take account of the character and significance of the area, including any important positive, negative or neutral architectural or historic elements or features within the area, as identified in the relevant Conservation Area Appraisal, Management Plan and / or Summary Statement.
 - f) Take account of the local character assessments, heritage and design policies included in any relevant adopted Neighbourhood Plans, along with any locally identified non-designated heritage assets, such as historically important local buildings, landmarks and key views etc.

Policy SE9: Historic Environment

- 2) Proposals that will lead to harm to, or loss of the significance of a heritage asset (from its alteration or destruction, or from development within its setting), will require clear and convincing justification. Where proposals will lead to:
 - a) Any direct or indirect impact on the significance of buildings associated (or formerly associated) with historic farmsteads: Proposals will be assessed having regard to the significance of the buildings and their contribution to the farmstead and character of the area and wider landscape. Where buildings and / or farmsteads are considered to have high heritage value, loss of buildings will be resisted and the significance of the buildings, farmstead and its setting will be expected to be conserved and, where possible, enhanced in accordance with the Design Code in Appendix 5.
 - b) Any direct or indirect impact on the significance of other forms of non-designated heritage asset: A balanced judgement will be made having regard to the significance of the heritage asset, any mitigation proposed and the scale of any residual harm or loss.
 - c) Less than substantial harm to the significance of a designated heritage asset: The proposals will be assessed having regard to the significance of the heritage asset, any mitigation proposed and the scale of any residual harm, with any harm weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
 - d) Substantial harm to (or total loss of significance of) a designated heritage asset: The proposals will be refused unless it can be demonstrated that the substantial harm or total loss has been mitigated against, as far as is reasonable, and that the residual harm is necessary to achieve substantial public benefits that outweigh the harm or loss, OR, all of the following apply:
 - The nature of the heritage asset prevents all reasonable uses of the site;
 - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - Conservation by grant-funding or some form of not-for-profit, charitable or public ownership is demonstrably not possible; and
 - The harm or loss is outweighed by the benefit of bringing the site back into use.
 - e) Substantial harm to, or loss of Grade II listed buildings or Grade II Registered Parks and Gardens: Proposals will be refused except in exceptional circumstances.
 - f) Substantial harm to, or loss of Scheduled Monuments, Registered Battlefields, Grade I or Grade II* listed buildings, or Grade I or Grade II* Registered Parks and Gardens: Proposals will be refused except in wholly exceptional circumstances. Applications involving Scheduled Monuments will also require Scheduled Monument Consent from the Secretary of State
 - g) The loss of the whole, or part of a heritage asset (and have passed the tests at criteria (d) above): Proposals will be refused unless
 - Robust evidence is submitted to demonstrate that a new development will proceed after the loss has occurred; and
 - Developers record and advance understanding of the significance of the heritage asset prior to its loss in a manner proportionate to its importance and the Record is submitted to the Historic Environment Record.
- 3) All proposals that have the potential to impact a designated or non-designated heritage asset or its setting should be accompanied by a Heritage Assessment (HA). The level of detail and expertise involved in the preparation of the HA should be proportionate to the assets' importance. As a minimum, the HA should be informed by the Historic Environment Record (HER) and should:
 - a) Describe the significance of the heritage asset/s affected, including any contribution made by their settings;
 - b) Describe and assess the likely impacts of the proposals on the significance of the heritage asset/s (positive, negative or neutral) and how the proposals will conserve and, where possible, enhance or better reveal significance;
 - c) Include an assessment of the cumulative impacts of the proposals alongside any other planned or committed developments (where applicable);
 - d) Where necessary, justify any identified harm to the significance of the heritage asset/s; and
 - e) Where the proposals include (or have the potential to include) heritage assets with archaeological interest, include an appropriate desk-based assessment and, where necessary, a field evaluation.
- 4) In accordance with the Council's positive approach to the conservation, enjoyment and understanding of the historic environment, the following types of development will be supported where they conserve,

Policy SE9: Historic Environment

enhance and / or better reveal the significance of the Borough's designated and non-designated heritage assets:

- a) New development within Conservation Areas (or within the settings of other heritage assets) that conserve and enhance and / or better reveal their significance and conserve those elements of their setting that make a positive contribution to significance.
- b) Enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, where the benefits of the proposals would outweigh the dis-benefits of departing from those policies. Such proposals will be particularly favourably considered in relation to the two heritage assets listed below, both of which are Grade II* listed buildings and are listed on the Historic England Heritage at Risk Register:
 - Model farm complex southwest of Betley Old Hall, Main Street, Betley, Newcastle-under-Lyme (List Entry Number 1188395); and
 - Gatehouse, walls and bollards to Maer Hall, Maer, Newcastle-under-Lyme (List Entry Number 1027834).
- c) Proposals for visitor-related / tourism infrastructure that better reveal the significance of the Battle of Blore Heath Registered Battlefield, or any of the Borough's designated Scheduled Monuments, subject to the character, integrity and significance of the affected heritage asset and its setting being conserved in a manner appropriate to its significance and in compliance with Policy EMP3 (Tourism), where applicable.
- d) Proposals that retain and interpret, in situ, the historic or social importance of historic features, such as plaques, memorials, statues and monuments (whether listed or not). Conversely, proposals to relocate or alter such features will be refused except in exceptional circumstances.
- 5) Proposals for shopfronts, awnings, canopies and blinds in Conservation Areas should use traditional materials and be carefully designed to complement the character of the Conservation Area. Security shutters in Conservation Areas should be avoided unless visually discreet and compatible with the character of the Conservation Area.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE9	0	0	0	0	0	0	++	+	0	0	0	+

- G.9.9.1 Newcastle-under-Lyme Borough supports a range of designated and non-designated cultural heritage features, which provide a sense of place and character to their surroundings. Policy SE9 sets out the requirement for development proposals to “*respond positively to local character and distinctiveness and should conserve and, where possible, enhance the significance of all heritage assets and their settings*” and will ensure Heritage Assessments are carried out where there is potential for adverse effects to occur. Furthermore, development proposals will be supported where they better reveal the significance of a designated or non-designated heritage asset. A major positive impact on cultural heritage could be achieved (SA Objective 7).
- G.9.9.2 The policy will require development proposals within the setting of heritage assets to conserve and enhance key views, respond to local distinctiveness, and carefully consider the design, layout and siting. Therefore, a minor positive impact on the local landscape is expected (SA Objective 8).

- G.9.9.3 The conservation and enhancement of cultural heritage assets could lead to an indirect minor positive impact on the local economy (SA Objective 12) through potentially encouraging tourism and supporting the visitor economy, where under the policy proposals for visitor-related / tourism infrastructure will be required to conserve the heritage asset and be in compliance with Policy EMP3 (Tourism).

G.9.10 Policy SE10: Landscape

Policy SE10: Landscape

- 1) Development proposals should protect and enhance the character, quality, beauty and tranquillity of the Borough. Specifically, proposals will be expected to:
 - a) Protect and enhance the Key Characteristics and comply with the relevant Landscape Guidelines, Guidance for Landscape Management and Guidance for Integrating Development into the Landscape for the relevant Landscape Character Type and Landscape Character Area, as identified in the Newcastle-under-Lyme Landscape and Settlement Character Assessment Study 2022 ('the LSCA') or any subsequent update.
 - b) Be informed by the historic landscape character mapping provided by the Staffordshire Historic Landscape Characterisation Project and identify and protect key natural and historic landscape features (and their settings) that contribute to the distinctive character of the local landscape, such as, boundary walls, hedgerows, mature trees, woodlands, enclosures, historic farmsteads, historic field patterns, ridge and furrow, marl pits, hillforts, barrows, mottes, moats, ponds and the Borough's only identified potential water meadow (within the grounds Maer Hall).
 - c) Identify and protect key views to and from the following landmark features, which are identified in the LSCA as being prominent within the landscape of the Borough, as well as key views to and from any other local landmark features that serve as orientation and navigation marks within the landscape:
 - Medieval Church of St Giles, Newcastle-under-Lyme
 - The Wedgwood Monument, Bignall Hill.
 - d) Protect and, where possible, enhance the character and setting of all designated and non-designated heritage assets within the Borough, in particular, the Borough's Registered Parks and Gardens at Keele Hall and Maer Hall.
 - e) Provide suitable and appropriate mitigation for the unavoidable loss or degradation of existing landscape features as a result of a proposal; and the restoration of existing despoiled, degraded, derelict, contaminated and / or unstable land.
 - f) Take account of the landscape policies, local landscape designations, landmarks and key views identified in any relevant adopted Neighbourhood Plans.
- 2) All proposals for major development (or other development that has potential for significant visual and landscape effects) should be accompanied by a Landscape and Visual Impact Assessment (LVIA) proportionate to the scale and likely impact of the proposals. The LVIA should identify the sensitivity of the landscape and the magnitude and significance of landscape and visual impacts resulting from the proposals, as well as an assessment of the cumulative impacts of the proposals alongside any other planned or committed developments in the area, where applicable.
- 3) All new landscaping schemes will be expected to:
 - a) Respond sympathetically to topography, landscape features and existing green and blue infrastructure networks and create a strong green infrastructure buffer on the interface between urban and rural areas to protect the setting of settlements and help integrate the development into the existing landscape.
 - b) Include characteristic features and elements to strengthen local landscape distinctiveness, including appropriate styles and materials in hard landscaping proposals and the provision of native species of local provenance in planting schemes.
 - c) Be integrated with the strategy for sustainable surface water management and, where appropriate, include sustainable surface water management features and space for water attenuation on site.
 - d) For major developments, where appropriate, identify and include opportunities for on-site water re-use / greywater recycling.
 - e) Include lighting schemes that minimise light pollution from artificial light on wildlife and intrinsically dark landscapes.
 - f) Include provision for the on-going maintenance of landscaped areas.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE10	+	0	+	0	+	+	+	++	+	0	0	0

- G.9.10.1 Policy SE10 aims to ensure that development proposals are guided by the findings of the Landscape and Settlement Character Assessment (LSCA)¹⁷ to conserve and enhance the local landscape character and distinctiveness. Under the policy, all proposals for major development or development that has potential for significant visual and landscape effects will be required to carry out a Landscape and Visual Impact Assessment (LVIA).
- G.9.10.2 By helping to ensure that future development proposals will not result in adverse impacts on the existing landscape character and providing guidance on how proposals should integrate with the surrounding landscape, including use of local materials, Policy SE10 is likely to conserve and enhance local landscape features and the overall landscape character of the area, with a major positive impact on the landscape overall (SA Objective 8).
- G.9.10.3 The key characteristics of some landscapes within Newcastle-under-Lyme focus around the historic environment including heritage assets, landmarks and monuments. By protecting and enhancing these key characteristics, this policy is expected to have a minor positive impact on cultural heritage (SA Objective 7).
- G.9.10.4 The policy encourages the use of native species in landscaping schemes, and integration of developments with existing green and blue infrastructure networks. Potential green/blue infrastructure enhancements under this policy could lead to multi-functional benefits including for climate change mitigation and adaptation, ecological networks, flooding, water quality and human health/wellbeing. Furthermore, the policy will encourage major developments to include opportunities for on-site water reuse and greywater recycling, which will lead to benefits for water quality and sustainable water management. Overall, a minor positive impact on SA Objectives 1, 3, 5, 6 and 9 could be achieved.

G.9.11 Policy SE11: Trees, hedgerows and woodland

Policy SE11: Trees, hedgerows and woodland

1. Development proposals should prioritise the retention and protection of existing trees, hedgerows, and woodlands. To ensure the long-term viability of these natural features, proposals should be supported by arboricultural Impact Assessments (for proposals impacting significant trees) and / or Hedgerow Surveys (where applicable)
2. Development proposals should include an early assessment of the site, ensuring that existing trees, hedgerows, and woodlands are identified and their mature size, location, and relationship to buildings and amenity space are explicitly considered within the design of the proposal.

¹⁷ Newcastle-under-Lyme Borough Council (2022). Newcastle-under-Lyme Landscape and Settlement Character Assessment. Available at: www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/23 [Date accessed: 23/05/24]

Policy SE11: Trees, hedgerows and woodland

3. Where the loss of significant trees, hedgerows, or woodlands is unavoidable, proposals should demonstrate:
 - Adequate replacement planting of appropriate species, providing a commensurate amenity and ecological value to the loss.
 - Integration of replacement planting within a comprehensive landscape scheme.
4. Where on-site replacement is demonstrably unfeasible, off-site provision, prioritised within the Borough, should be explored. Off-site replacement contributions will be determined in consultation with the Council, utilising suitable valuation methods such as the Capital Asset Valuation of Amenity Trees (CAVAT). Compensation for woodland loss should adhere to the DEFRA biodiversity offsetting metric as outlined in Policy ENV 2 'Ecological Implementation'.
5. New planting within development sites should seek to increase overall tree canopy cover, ensuring the selection of species appropriate to the character of the area and prioritising native species wherever possible. Consideration should be given to species that offer climate resilience, biodiversity value, and contribute to wider environmental benefits, including improvements to air quality and flood mitigation.
6. Development should include tree-lined streets and where tree planting is proposed, consider the impact on utility services, in particular, drainage systems and other potentially affected pipelines.
7. Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include:
 - Establishing buffer zones: Maintaining appropriate buffer zones between development and woodlands to minimise disturbance and protect ecological integrity.
 - Mitigating light pollution: Implementing measures to reduce light spill and glare from development, such as directing lighting downwards and using appropriate shielding, to protect nocturnal wildlife and dark skies.
 - Protecting hydrological connectivity: Ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses, such as through the use of sustainable drainage systems and the preservation of natural drainage features.
8. New streets should incorporate tree-lined designs unless there are clear and compelling reasons justifying their absence.
9. Development proposals should include appropriate measures to ensure the ongoing management and maintenance of newly planted trees, hedgerows, and woodlands.
10. Ancient or veteran trees should be retained, protected, and integrated into development schemes, preferably within public open space. Proposals affecting these features should include management plans in accordance with Natural England guidelines. Development should provide appropriate buffer zones surrounding ancient woodlands to prevent harm.
11. Development proposals impacting sites comprising Ancient Woodland or veteran trees should include assessments of the impact in accordance with Natural England's Specialist Survey Method for Veteran Trees. Where applicable, long-term management plans conforming to Natural England guidelines should be included within the proposal.
12. Schemes incorporating existing woodland should include detailed management proposals ensuring the long-term sustainability and enhancement of these valuable ecological assets.
13. Hedgerows, particularly those designated as 'important' under the Hedgerows Regulations (1997), are distinctive elements of the Borough's landscape and form valuable habitats. Development proposals resulting in the removal of 'important' hedgerows should include a full assessment to demonstrate compliance with the Regulations.
14. Schemes that help to deliver the Council's Carbon Capture Areas and Urban Tree Planting Strategy to facilitate carbon capture will be supported.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE11	+	+	++	+	+	+	0	+	+	0	0	0

G.9.11.1 Policy SE11 aims to create, retain and protect trees, hedgerows and woodlands, including ancient woodland and veteran trees across the Plan area. Where the loss of a tree is unavoidable, this policy requires the replacement trees to be appropriate to the character

of the area and should prioritise the planting of native species. Under this policy, an arboricultural survey is required by development proposals to ensure the long-term viability of natural features. The policy requires development proposals adjacent to existing woodlands to maintain an appropriate buffer zone between development, minimising disturbance and protecting biodiversity assets and the ecological value of these assets. Furthermore, the policy identifies the importance of ancient and veteran trees, that *"should be retained, protected, and integrated into development schemes"*. Trees, hedgerows and woodland support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, Policy SE11 could potentially have a major positive impact on biodiversity (SA Objective 3).

- G.9.11.2 Trees and vegetation provide carbon sink and air filtration ecosystems services, which will be safeguarded by the retention and enhancement of trees, hedgerows and woodland under this policy. Furthermore, this could help to reduce local residents' exposure to air pollution, for example through filtration or buffering of emissions associated with transport related air pollution. Enhanced carbon storage could also help mitigate anthropogenic climate change. Overall, a minor positive impact is likely for climate change mitigation, air quality, and the health and wellbeing of residents (SA Objectives 1, 2 and 9).
- G.9.11.3 The retention and enhancement of trees, vegetation and hedgerows is likely to preserve soils and act as natural water storage, helping manage, filter and reuse water, reducing the risk of surface water flooding and improving water quality. A minor positive impact is likely for natural resources, flood risk and water quality (SA Objectives 4, 5 and 6).
- G.9.11.4 Replacement trees and new planting within a development is to be *"appropriate to the character of the area"*, which could protect or enhance views. Therefore, this policy could result in a minor positive impact on the local landscape character (SA Objective 8).
- G.9.11.5 Policy SE11 could be further enhanced through ensuring that appropriate, and preferably native / locally important, species are planted through any new schemes in suitable locations, informed by a qualified ecologist / arboriculturalist. This will help to ensure 'the right tree in the right place'¹⁸.

G.9.12 Policy SE12: Amenity

Policy SE12: Amenity

1. Development proposals should demonstrate they will not result in unacceptable harm to the amenities of existing or future residents, businesses, or sensitive uses in the vicinity. Development that would have an unacceptable adverse impact on existing amenity will not be permitted. This includes the consideration of:
 - Preventing unacceptable overlooking and loss of privacy.
 - Avoiding unacceptable loss of sunlight and daylight.
 - Mitigating the overbearing and dominating effect of new buildings.
 - Minimising environmental disturbance or pollution.
 - Addressing traffic generation, access, and parking.

¹⁸ Forestry Commission (2022) Urban Tree Manual: The Right Tree in the Right Place for a Resilient Future. Available at: <https://www.forestryresearch.gov.uk/tools-and-resources/ftth/urban-tree-manual/> [Date accessed: 31/05/24]

Policy SE12: Amenity

- Protecting existing trees and landscaping that contribute to amenity value, and ensuring appropriate replacement or enhancement where necessary.
2. New development should effectively integrate with existing uses, and existing businesses and community facilities must not have unreasonable restrictions placed on them as a result of new development. Where the operation of an existing business or facility could have a significant adverse effect on a proposed new development in its vicinity, the applicant (developer) should provide a suitable assessment, such as a noise impact assessment or a light pollution study, to demonstrate the following:
 - The nature and extent of potential amenity impacts on future occupants.
 - That the proposed development incorporates adequate mitigation measures to protect the amenity of future occupants, or
 - That the business or facility can modify its operations to minimise adverse impacts without unreasonable restrictions on its operations.
 - The assessment should consider factors such as noise levels, operating hours, traffic generation, and light pollution, and should be conducted in accordance with relevant industry standards and guidelines.
 3. Where significant adverse effects cannot be effectively mitigated, and no acceptable compromise in operations can be reached, planning permission will be refused.
 4. The Council will utilise available planning enforcement mechanisms, such as planning conditions, legal agreements, or enforcement notices, to ensure compliance with the Agent of Change principle and address situations where mitigation measures are not effective or reasonable compromises cannot be reached. This may involve requiring the modification of existing operations, the implementation of additional mitigation measures, or, in extreme cases, the restriction or cessation of activities that cause unacceptable harm to amenity.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE12	0	0	0	0	0	0	0	+	+	0	0	0

G.9.12.1 Policy SE12 ensures that development proposals do not harm the amenity of existing or future residents, businesses, or sensitive uses in the area. Development will not be permitted where an adverse impact on amenity is likely.

G.9.12.2 The policy ensures amenity aspects such as noise, light pollution, environmental disturbance and traffic generation are considered. The measures under this policy will help to protect the landscape character and could potentially result in a minor positive impact on local landscape character (SA Objective 8) and wellbeing (SA Objective 9).

G.9.13 Policy SE13: Soil and Agricultural Land

Policy SE13: Soil and Agricultural Land

- 1) Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land.
- 2) Proposals for development on BMV land (Grades 1, 2, and 3a) will only be supported where:

Policy SE13: Soil and Agricultural Land

- a) There is an overriding need for the development that cannot be met on lower-quality land.
- b) It has been demonstrated that there are no suitable alternative sites on land of lower agricultural quality.
- c) Where development on BMV land is unavoidable, proposals must include a detailed mitigation strategy outlining measures to offset the loss of high-quality soil resources and explore opportunities to enhance soil quality on other areas of the site.
- 3) Development proposals should demonstrate how they will protect existing soil resources and promote sustainable soil management throughout all phases of development, from site preparation to construction and landscaping. Development proposals should incorporate measures to:
 - a) Minimise soil disturbance, compaction, and erosion.
 - b) Retain and reuse topsoil on-site wherever possible.
 - c) Incorporate soil improvement measures where necessary, such as the addition of organic matter.
- 4) The Council will consider the cumulative impacts of development proposals on the overall quality and availability of agricultural land and soil resources within the Borough. This includes assessing the potential for fragmentation of agricultural land, the loss of productive soils, and the impact on the viability of agricultural businesses. Where significant cumulative impacts are identified, the Council may require additional mitigation measures or consider alternative development options.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE13	+	0	0	++	0	0	0	0	0	0	0	+

- G.9.13.1 Policy SE13 protects the best and most versatile (BMV) agricultural land in the Plan area. Development unable to avoid the loss of BMV land must provide a detailed mitigation strategy to offset the loss of BMV land and explore opportunities for soil enhancement on other areas of the site.
- G.9.13.2 The protection of BMV land will ensure that undeveloped land in the borough is conserved where possible, encouraging the use of previously developed land for development purposes. A major positive impact on natural resources is identified (SA Objective 4).
- G.9.13.3 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services including cycling water and nutrients, decomposing organic matter and supporting plant growth. Through conserving BMV agricultural land for continued or future use in food production, the policy could potentially result in a minor positive impact on the rural economy (SA Objective 12). Furthermore, by seeking to conserve important soil resources, the policy will contribute towards a reduction in soil erosion, and safeguard the resilience of soils to a changing climate. A minor positive impact on climate change could be achieved (SA Objective 1).

G.9.14 Policy SE14: Green and Blue Infrastructure

Policy SE14: Green and Blue Infrastructure

1. Development proposals should incorporate multifunctional Green Infrastructure and Blue Infrastructure elements as an integral part of the design from the outset. These elements should:
 - a. Address climate resilience through measures such as sustainable drainage systems (SuDS), green roofs, walls, urban tree planting, and other nature-based solutions that contribute to climate action goals.

Policy SE14: Green and Blue Infrastructure

- b. Support town centre regeneration and enhance public spaces through high-quality urban green spaces, landscaping, and street trees.
 - c. Contribute to biodiversity objectives by creating new habitats and incorporating features that enhance existing ecological networks.
2. Where development proposals result in the loss or degradation of existing Green Infrastructure and Blue Infrastructure assets and, where the benefits of the development demonstrably outweigh the harm caused. Applicants must demonstrate that:
 - a. All appropriate alternatives that avoid harm have been fully considered and shown to be unviable.
 - b. Suitable mitigation and compensatory measures have been proposed to offset any unavoidable loss or damage.
 - c. Opportunities to enhance existing Green Infrastructure and Blue Infrastructure assets in the vicinity of the development site have been explored and, where feasible, will be incorporated into the scheme.
 - d. In accordance with national guidance, development proposals must demonstrate a net gain in biodiversity through measurable habitat creation, restoration, and enhancement, contributing to the Council's strategic Nature Recovery Network.
3. Development proposals should, where appropriate, contribute to the creation of a well-connected Green Infrastructure and Blue Infrastructure network throughout the Borough. This includes:
 - a. Enhancing and extending existing green corridors, including canal towpaths, to support biodiversity, active travel, and connections between communities and nature.
 - b. Designing schemes that improve access to and within Green Infrastructure and Blue Infrastructure assets, particularly within areas of lower environmental quality or health inequalities.
 - c. Residents should have access to a high-quality green space
4. Development proposals incorporating new or enhanced Green Infrastructure assets should include a detailed management and maintenance plan outlining responsibilities, funding mechanisms, and long-term stewardship arrangements.
5. The Council will explore various funding mechanisms for Green Infrastructure maintenance, such as developer contributions, dedicated funding streams, or community-based stewardship programs. Opportunities for community involvement in the management and maintenance of Green Infrastructure assets will be actively encouraged.
6. The Council encourages a collaborative and community-centred approach to the planning, design, and management of Green Infrastructure assets. Opportunities for community involvement in Green Infrastructure projects and long-term stewardship will be actively supported.
7. The Council supports innovative Green Infrastructure and Blue Infrastructure solutions that deliver multiple benefits, such as nature-based flood management, carbon sequestration, and community-led initiatives. Where these contribute to the Council's strategic objectives or other local priorities, they will be strongly encouraged.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SE14	+	+	++	+	++	+	0	+	+	0	+	0

G.9.14.1 Policy SE14 sets out the requirements of development proposals in regard to green infrastructure and blue infrastructure as an “*integral part of the design from the outset*”.

G.9.14.2 Development proposals are encouraged to enhance the existing green and blue infrastructure, which could include “*sustainable drainage systems (SuDS), green roofs, walls, urban tree planting, and other nature-based solutions*”. Multi-functional benefits of green and blue infrastructure will be likely to support local biodiversity and improve ecological connectivity, as well as helping to mitigate flood risk through SuDS provision

and exploring nature-based solutions. A major positive impact is identified for biodiversity (SA Objective 3) and flooding (SA Objective 5).

- G.9.14.3 Additionally, multi-functional benefits of green and blue infrastructure will also be likely to include the conservation of natural resources, helping to mitigate extreme temperatures, and improving air quality, if designed carefully, and water quality from natural filtration. A minor positive impact is identified for climate change mitigation and adaptation, air quality, natural resources, and water quality (SA Objectives 1, 2, 4 and 6).
- G.9.14.4 The policy encourages opportunities to be sought to link green and blue infrastructure improvements into wider public realm and connectivity initiatives, providing open space and attractive active travel routes for recreation and benefitting residents' health and wellbeing. Through enhancing public spaces and the provision of *"high-quality urban green spaces, landscaping, and street trees"*, the local landscape could be enhanced. A minor positive impact is identified for landscape character, human health and accessibility (SA Objectives 8, 9 and 11).

G.10 Rural Matters

G.10.1 Policy RUR1: Rural Economy

Policy RUR1: Rural Economy

1. Outside settlement boundaries and established employment sites, applications for the following forms of development will be permitted, subject to meeting the criteria set out in criterion 2 and, in the case of proposed new enterprises, the submission of evidence to demonstrate that the proposed business is viable:
 - a. Small-scale employment development appropriate to rural areas;
 - b. Expansion of existing rural businesses;
 - c. Provision of / diversification of agricultural and other land-based rural businesses;
 - d. Sustainable rural-based sport, leisure, recreation and tourism facilities requiring and appropriate to a rural location; and
2. Development will be supported where the proposals would:
 - a. Facilitate the retention or growth of local employment opportunities or existing services and facilities that support a local need;
 - b. Improve the sustainability of a site in terms of access (where opportunities exist);
 - c. Prioritise the re-use of previously developed land and / or sites that are physically well-related to existing settlements;
 - d. Not involve the unsightly storage of, or work on, goods outside of built premises;
 - e. Re-use, conserve and, where possible, enhance the significance of historic farm buildings (where they exist) in accordance with Policy SE 9 (Historic Environment)
 - f. Re-use disused buildings of substantial construction that are structurally sound and capable of conversion and that were constructed for and previously used in connection with an authorised activity, and / or, provide new buildings that are of exceptional design-quality that either reflect local character (incorporating design features distinctive to the local area) or are of a contemporary or innovative design;
 - g. Conserve and enhance the character and quality of the landscape in accordance with Policy SE 10 (Landscape)
 - h. Sustain and enhance the significance of any affected heritage assets (and their settings) in accordance with Policy SE 9 (Historic Environment)
 - i. Not have an undue adverse impact on the operation or amenity of any existing nearby uses;
 - j. Not undermine the vitality and viability of rural settlements;
 - k. Not result in the loss of a designated community asset;
 - l. Not undermine the delivery of a strategic employment allocation;
 - m. Not be of such a scale or type of development where its associated impacts would indicate that it would be more appropriately located within a settlement boundary, or designated employment site; and
 - n. Be served by adequate infrastructure, in particular, safe access and not have an undue adverse impact on local roads.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RUR1	0	0	0	+	0	0	+	+	+	0	0	++

- G.10.1.1 Policy RUR1 sets out the development proposals that will be supported outside settlement boundaries and established employment sites, for example supporting small-scale employment development that is appropriate to rural areas and the expansion of existing rural businesses. Development will need to improve the sustainability of the site in relation to accessibility, and any development that facilitates the retention or growth of local

employment opportunities will be supported. The supported development under this policy is expected to increase employment opportunities and encourage diversity and improve the quality of employment types, including rural diversification, as such a major positive impact on the economy is identified (SA Objective 12).

- G.10.1.2 The policy supports development that will re-use, conserve and, where possible, enhance the significance of historic farm buildings and heritage assets and their settings. Furthermore, enhancements to the landscape character and quality of the landscape will be supported, also ensuring that developments are of exceptional design-quality and reflect local character. A minor positive impact is identified for cultural heritage and landscape character (SA Objectives 7 and 8).
- G.10.1.3 Under the policy the delivery of local services which includes open spaces, recreation and leisure facilities will be supported, providing local residents with sustainable access to these services and could expect a minor positive impact on the health and mental wellbeing of existing and future residents (SA Objective 9).
- G.10.1.4 Although the policy supports rural development, the re-use of disused buildings and previously developed land will be encouraged and prioritised, thereby helping to protect the borough's undeveloped land on the whole. A minor positive impact on natural resources is identified (SA Objective 4).

G.10.2 Policy RUR2: Rural Workers Dwellings

Policy RUR2: Rural Workers Dwellings

- 1) Outside settlement boundaries applications for new dwellings for essential rural workers will be permitted where:
 - a) It can be demonstrated that there is an essential functional need for a rural worker to live permanently at or near their place of work in the countryside;
 - b) It can be demonstrated that the business is likely to remain viable for the foreseeable future;
 - c) A suitable dwelling cannot be provided by re-using an existing building on the land holding;
 - d) A dwelling, or building suitable for conversion to a dwelling within the land holding, has not been sold on the open housing market without an agricultural or other occupancy condition in the last five years;
 - e) A suitable dwelling is not available (or likely to become available within a reasonable time-scale) on a nearby allocated site, or within a nearby settlement;
 - f) The dwelling is located within, adjacent to, or within a reasonable distance of the business, or close to other buildings on the associated land holding;
 - g) The scale of the dwelling is proportionate to the essential need;
 - h) The dwelling is of a high design-quality that either reflects local character (incorporating design features distinctive to the local area) or is of a contemporary or innovative design;
 - i) The proposals conserve and enhance the character and quality of the landscape in accordance with Policy SE 10 (Landscape)
 - j) The proposals sustain and enhance the significance of any affected heritage assets (and their settings) in accordance with Policy SE 9 (Historic Environment)
 - k) The site is served by adequate infrastructure, in particular, safe access.
- 2) Where the proposal relates to a proposed or new business that cannot yet demonstrate financial soundness, a temporary dwelling (in the form of a caravan, mobile home or wooden structure that can easily be removed from the site) may be acceptable provided all other criteria outlined in criterion 1 are met.
- 3) Where a new dwelling is permitted, occupancy will be restricted by planning condition to occupation by a person, or persons currently or last employed by the business in question, or generally in local agriculture, horticulture, forestry or other local rural activities (as appropriate), or their surviving partner or dependant(s). A legal obligation may also be required including a claw-back clause requiring the payment of a financial contribution towards the provision of affordable housing where it is subsequently evidenced that the dwelling is no longer required as an essential rural worker's dwelling.

Policy RUR2: Rural Workers Dwellings

- 4) Applications for the removal of an occupancy condition related to a rural workers dwelling will only be permitted where:
- It can be demonstrated that there is no longer an essential need for accommodation at the business / on the land holding or in the local area; and
 - The property has been marketed for a reasonable period (at least 12 months) at a price that reflects the existence of the occupancy condition (an independent valuation will be required to justify the market price).

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RUR2	0	0	0	+/-	0	0	+	+	0	+	0	+

- G.10.2.1 Paragraph 84 of the NPPF¹⁹ states that *"planning policies and decisions should avoid the development of isolated homes in the countryside unless... there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside"*. Applicants will need to prove the need for permanent or temporary dwellings and be able to satisfy the criteria set out within the policy.
- G.10.2.2 Policy RUR2 relates to the housing of rural workers, highlighting the requirement for essential need to be demonstrated in order for them to be permitted. This policy is anticipated to help ensure that the rural workers in question live near the worked land, are able to live in a location that permits access into their place of work, and thereby support the rural economy at an appropriate level. Therefore, this policy is expected to have a minor positive impact on housing provision and the economy (SA Objectives 10 and 12).
- G.10.2.3 The policy will serve to restrict development outside the requirements for these purposes and ensures proposals will be of high-quality design and in keeping with the landscape character. Furthermore, the policy will ensure development proposals retain and enhance historic assets and their settings. Therefore, the policy could potentially have a minor positive impact on the historic environment and landscape character (SA Objective 7 and 8).
- G.10.2.4 The policy supports development outside settlement boundaries, where new development could potentially be located on previously undeveloped land. As such, development proposals could potentially result in the loss of soil, although, without knowledge of specific locations the effect on natural resources is uncertain (SA Objective 4).

¹⁹ DLUHC (2023). National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date accessed: 24/05/24]

G.10.3 Policy RUR3: Extensions and Alterations to Buildings Outside of Settlement Boundaries

Policy RUR3: Extensions and Alterations to Buildings Outside of Settlement Boundaries

- 1) Outside settlement boundaries extensions and alterations to existing dwellings will be permitted where the proposals:
 - a) Are subservient to the existing dwelling and will not result in a disproportionately larger dwelling than the original dwelling on the site (a maximum increase of 50% in volume compared with the original dwelling);
 - b) Respect the scale of the plot and the scale and character of the existing dwelling and other dwellings in the vicinity;
 - c) Are of a high design-quality that either reflects local character (incorporating design features distinctive to the local area) or are of a contemporary or innovative design;
 - d) Conserve and enhance the character and quality of the landscape in accordance with Policy SE 10 (Landscape)
 - e) Sustain and enhance the significance of any affected heritage assets (and their settings) in accordance with Policy SE 9 (Historic Environment)
 - f) Would not have an unduly adverse impact on the operation or amenity of any existing nearby uses; and
 - g) Are served by adequate infrastructure, in particular, safe access.
- 2) Where extensions and alterations are proposed to replacement dwellings (i.e. dwellings that have replaced other dwellings on their site since 2000), the maximum increase in floor area set out in criterion 1 above will be assessed against the floor area of the dwelling replaced by the existing dwelling. Where details of that dwelling are unavailable, the maximum increase in floor area permitted to the replacement dwelling will be 20%, to align with Policy RUR 4 (Replacement Buildings Outside of Settlement Boundaries).
- 3) Outside settlement boundaries residential annexes and outbuildings will be permitted where:
 - a) They adjoin or are located in close proximity to the existing dwelling and within its established curtilage;
 - b) They are proportionate to the scale of the existing dwelling; and
 - c) The proposals comply with criteria (c) to (g) of criterion 1 of this policy.
- 4) In instances where it would be undesirable for an additional dwelling to be established and where a proposed residential extension, outbuilding or annexe is capable of being occupied as a separate self-contained residential unit, where granted planning permission will be subject to a condition and / or a unilateral undertaking restricting occupation of the unit to being ancillary to the main dwelling.
- 5) Outside settlement boundaries extensions and alterations to buildings other than dwellings will be permitted where:
 - a) The building is in use, or is proposed to be used in connection with any of the forms of development listed at criterion 1 of Policy RUR 1 (Rural Economy);
 - b) The proposals are for a development subservient to the existing building and will not result in a building that is materially larger than the existing building (a maximum 20% increase in floor space), unless it can be demonstrated that a particular scale or design of extension to the building is required; and
 - c) The proposals comply with the criteria listed at criterion 2 of Policy RUR 1 (Rural Economy) where applicable.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RUR3	0	0	0	+/-	0	0	+	+	0	0	0	0

G.10.3.1 Policy RUR3 sets out the requirements of extensions and alterations to buildings outside of settlement boundaries.

- G.10.3.2 Extensions and alterations under the policy will be of high-quality design and in keeping with the landscape character. Furthermore, the policy will ensure development proposals retain and enhance historic assets and their settings. Therefore, the policy could have a minor positive impact on the historic environment and landscape character (SA Objective 7 and 8).
- G.10.3.3 The policy supports extensions to existing buildings on sites adjoining settlement boundaries, where new development could potentially be located on previously undeveloped land. As such, development proposals could potentially result in the loss of soil, although, without knowledge of specific locations the effect on natural resources is uncertain (SA Objective 4).

G.10.4 Policy RUR4: Replacement Buildings Outside of Settlement Boundaries

Policy RUR4: Replacement Buildings Outside of Settlement Boundaries

- 1) Outside settlement boundaries the replacement of existing dwellings will be permitted where:
 - a) The site contains a permanent dwelling with an extant, lawful residential use and the dwelling has not been abandoned or allowed to fall into such a state of dereliction that any replacement would in effect be treated as a 'new dwelling' (a structural survey will be required where signs of dereliction are visible or where the building has been unoccupied for some time);
 - b) The dwelling respects the scale of the plot and the scale and character of the existing dwelling and other dwellings in the vicinity;
 - c) The dwelling is not substantially larger than the original dwelling (a maximum increase of 50% in volume compared to the original dwelling), with a height and massing similar to that of the existing dwelling;
 - d) The dwelling is of a high design-quality that either reflects local character (incorporating design features distinctive to the local area) or is of a contemporary or innovative design;
 - e) The proposals conserve and enhance the character and quality of the landscape in accordance with Policy SE 10 (Landscape)
 - f) The existing dwelling is not a building formerly associated with a historic farmstead, or a building of other architectural or historic merit that makes an important contribution to the distinctive character of the area;
 - g) The proposals sustain and enhance the significance of any affected heritage assets (and their settings) in accordance with Policy SE 9 (Historic Environment)
 - h) The proposals would not have an unduly adverse impact on the operation or amenity of any existing nearby uses; and
 - i) The site is served by adequate infrastructure, in particular, safe access.
- 2) Outside settlement boundaries the replacement of buildings other than dwellings will be permitted where:
 - a) The building was constructed for and has previously been used in connection with an authorised activity;
 - b) The building is of permanent construction and is substantially intact;
 - c) The proposed use is the same as the last lawful use of the building (where it has not been abandoned), or a use that would fall within those listed at Criterion 1 of Policy RUR 1 (Rural Economy);
 - d) The replacement building is not materially larger than the one it replaces (a maximum 20% increase in floor area), with a height and massing similar to that of the original building, unless it can be demonstrated that a particular scale or design of replacement building is required; and
 - e) The proposals comply with the criteria listed at Criterion 2 of Policy RUR 1 (Rural Economy) where applicable.
 - f) The replacement building is of a high design-quality that either reflects local character (incorporating design features distinctive to the local area) or is of a contemporary or innovative design;
 - g) The proposals conserve and enhance the character and quality of the landscape in accordance with Policy SE 9 (Landscape)
 - h) The existing building is not a building formerly associated with a historic farmstead, or a building of other architectural or historic merit that makes an important contribution to the distinctive character of the area;

Policy RUR4: Replacement Buildings Outside of Settlement Boundaries

- i) The proposals sustain and enhance the significance of any affected heritage assets (and their settings) in accordance with Policy SE 10 (Historic Environment)
- j) The proposals would not have an unduly adverse impact on the operation or amenity of any existing nearby uses; and
- k) The site is served by adequate infrastructure, in particular, safe access.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RUR4	0	0	0	+/-	0	0	+	+	0	0	0	0

G.10.4.1 Policy RUR4 sets out the requirements of replacement buildings that are located outside of settlement boundaries, supporting development proposals where the dwelling is located on the same footprint as the original dwelling and is not substantially larger than the original dwelling. This could encourage the use of previously developed land to some extent, although there is potential for loss of important soil resources. The overall impact on natural resources (SA Objective 4) is uncertain, without knowledge of specific locations for where development could come forward under the policy.

G.10.4.2 Replacement buildings under the policy will be of high design-quality and in keeping with the landscape character. Furthermore, the policy will ensure development proposals retain and enhance historic assets and their settings. Therefore, the policy could have a minor positive impact on the historic environment and landscape character (SA Objective 7 and 8).

G.10.5 Policy RUR5: Re-use of Rural Buildings for residential use

Policy RUR5: Re-use of Rural Buildings for residential use

1. Outside settlement boundaries the re-use of redundant and disused buildings for residential use will be permitted where:
 - a. The building is of a substantial construction, is structurally sound and is capable of conversion without the need for significant new building works and / or extension;
 - b. The building was constructed for and has previously been used in connection with an authorised activity and is no longer required in connection with that use;
 - c. It can be demonstrated that the building is not required to provide an essential rural worker's dwelling in connection with any business activity associated with the land holding;
 - d. It can be demonstrated that every reasonable attempt has been made to secure a suitable business use for the premises, including evidence of a minimum of 12 months marketing (for sale or rent at the prevailing market rate) within the 18-month period prior to submission of the application;
 - e. The proposals conserve and enhance the character and quality of the landscape in accordance with Policy SE 10 (Landscape)
 - f. The proposals sustain and enhance the significance of any affected heritage assets, including buildings formerly associated with a historic farmstead (and their settings) in accordance with Policy SE 9: Historic Environment
 - g. The building in question is not located within 400 metres of an agricultural livestock unit and the residential use would not have an unduly adverse impact on the operation or amenity of any existing nearby uses; and
 - h. The site is served by adequate infrastructure, in particular, safe highway access.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
RUR5	0	0	0	+	0	0	+	+	0	0	0	0

- G.10.5.1 Policy RUR5 sets out the requirements that development proposals which include the re-use of rural buildings for residential use should follow. The policy will support proposals that are "*capable of conversion without the need for significant new building works and / or extension*"; as such, the policy could encourage the re-use of previously developed land and protect and retain the borough's undeveloped land. A minor positive impact could be expected on natural resources (SA Objective 4).
- G.10.5.2 The re-use of rural buildings under the policy will be of high design-quality and in keeping with the landscape character. Furthermore, the policy will ensure development proposals retain and enhance historic assets and their settings. Therefore, the policy could have a minor positive impact on the historic environment and landscape character (SA Objective 7 and 8).

G.11 Site Allocations

G.11.1 Policy SA1: General Requirements

Policy SA1: General Requirements

- There are a number of sites proposed to be allocated in the Plan at various spatial scales, some of strategic significance. Irrespective of the type and nature of intended end use, all sites allocated in the Plan and proposals that subsequently come forward will need to conform to the general requirements outlined in Table 5 below.

Strategic Requirements

Master Plans	<ul style="list-style-type: none"> For major sites of 10 or more dwellings or 0.5 hectares or more site wide master plans will be prepared by the applicant and agreed with the Council to deliver high quality, sustainable and policy compliant developments. Masterplans will also be required for major commercial sites. Master Plans will cover broad location, quantum of development, range of uses, layout and design of development, transport / access and key infrastructure. Master Plans should set out the approach to achieving sustainable modes of access including reducing the need to travel by private car in accordance with Policies IN2 and IN3. Master Plans should also demonstrate how the design and layout of development incorporates infrastructure to accommodate active travel. A hierarchy approach will be adopted to site access where priority is given to establishing pedestrian, cycle and public transport access and connections. Master Plans should also have regard to relevant guidance prepared by Staffordshire County Council.
Neighbourhood Plans	<ul style="list-style-type: none"> Site allocations will have consideration to the aims, objectives and relevant policies of 'Made' Neighbourhood Plans.

Housing

Affordable Housing	<ul style="list-style-type: none"> Major residential development sites of 10 or more dwellings or 0.5 hectares or more will provide affordable housing in accordance with Policy HOU1: <ul style="list-style-type: none"> 30% on Greenfield Sites 15% on Brownfield Sites in the 'Low Value Zone'. 25% on Brownfield Sites in the 'High Value Zone'.
Housing Mix and Density	<ul style="list-style-type: none"> Residential development will deliver an appropriate mix of housing and densities in line with Policy HOU2.

Design

Design Quality	<ul style="list-style-type: none"> New development will be delivered to a high quality of design in accordance with the National Design Code, National Design Guidance, local design guides / codes and in accordance with criteria set out in PSD7.
Housing Standards	<ul style="list-style-type: none"> Housing will be designed and delivered in accordance with the space and accessibility standards set out in Policy HOU3.
Sustainable Standards of Construction, Water and Energy Use	<ul style="list-style-type: none"> Residential and non-residential development will be designed and delivered in accordance with the standards for sustainable construction, water and energy efficiency set out in Policy CRE1. Developments must consider the capacity limitations outlined in the Water Cycle Study (WCS). Where constraints exist mitigation measures must be implemented in accordance with Policy SE5. Developments are encouraged to incorporate water re-use strategies in accordance with Policy SE5 to reduce demand on water supplies.
Renewable Energy	<ul style="list-style-type: none"> Developments should optimise the use of decentralised, renewable or low carbon energy sources in accordance with Policy CRE2. Major developments should provide an energy statement which demonstrates the maximum feasible and viable use of onsite renewable energy for at least 10% of energy needs in accordance with Policy CRE2.

Historic Environment

Policy SA1: General Requirements

Heritage Assets	<ul style="list-style-type: none"> Development should conserve and enhance designated and non-designated heritage assets and their settings in accordance with Policy SE9.
Heritage Impact Assessments	<ul style="list-style-type: none"> Developments that have the potential to impact a designated or non-designated heritage asset will be accompanied by a Heritage Impact Assessment prepared in accordance with Policy SE9.
Heritage Assets with Archaeological Interest	<ul style="list-style-type: none"> Where development includes or has the potential to include heritage assets with archaeological interest (below or above ground), an assessment of the archaeological potential of the site will be required. This will include an appropriate desk-based assessment, and where necessary, a field evaluation. The scope of any field evaluation should be agreed with the Council in advance, and a Written Scheme of Investigation provided prior to any site investigations taking place.

Social and Community Facilities

Community Facilities	<ul style="list-style-type: none"> New development will contribute towards and where appropriate provide new community facilities and associated infrastructure in accordance with Policy IN1.
Education	<ul style="list-style-type: none"> Residential development will be required to contribute towards enhancing education capacity (early needs, special education needs, primary and secondary) in accordance with Policy IN1.
Health Care Provision	<ul style="list-style-type: none"> Residential development will contribute towards healthcare and leisure provision in accordance with Policies IN1 and PSD6.
Health and Wellbeing	<ul style="list-style-type: none"> New development will support safe, healthy and active lifestyles through appropriate design of development and access to facilities in accordance with Policy PSD6.
Open Space and Recreation Facilities	<ul style="list-style-type: none"> New residential development will provide public open space and recreation facilities in accordance with Policy SE6.

Landscape and Green Infrastructure

Landscape Assessments	<ul style="list-style-type: none"> A proportionate Landscape Appraisal (LVA) will be required where appropriate. Where an Environmental Impact Assessment requires, a Landscape and Visual Impact Assessment will be required in accordance with Policy SE10. The Council's Landscape and Settlement Character Study (2022) will be considered including guidance as it applies to respective site allocations.
Green and Blue Infrastructure	<ul style="list-style-type: none"> Development will provide green and blue infrastructure and contribute to enhancing the wider network in accordance with Policy SE14 and Policy IN1. Development will seek opportunities to enhance watercourses (rivers, streams and canals) and their associated habitats in accordance with Policy SE5.
Trees, Hedgerows and Woodlands	<ul style="list-style-type: none"> Where trees, hedgerows or woodlands are likely to be affected by a development, Arboricultural Impact Assessments, hedgerow surveys will be required. Appropriate mitigation measures will also be required in accordance with Policy SE11. The design, layout and maintenance of developments and the provision of new planting should be in accordance with Policy SE11. Development adjacent to existing woodlands will consider impacts and appropriate mitigation measures (including relevant buffer zones) in line with Policy SE11.

Biodiversity and Geodiversity

Policy SA1: General Requirements

Habitats and Species Surveys	<ul style="list-style-type: none"> Relevant habitats and species surveys will be required in accordance with Policy SE8.
International Designations	<ul style="list-style-type: none"> Appropriate mitigation will be delivered in accordance with Policy SE8 to mitigate the impact of air pollution on SAC / RAMSAR sites, water quality and quantity on riverine habitats and recreational pressure on Ramsar habitats. Appropriate mitigation will be secured to address likely significant effects on international nature conservation designations in accordance with Policy SE8.
National, local designations and irreplaceable habitats	<ul style="list-style-type: none"> Appropriate mitigation will be required (including relevant buffer zones) for development that is near to or could adversely affect Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNRs), Biodiversity Opportunity Areas (BOA) / Nature Recovery Networks (NRN), Sites of Importance to Nature Conservation (SINC) and irreplaceable habitats including Ancient Woodland in accordance with Policy SE8.
Water Quality, Pollution, and Nutrient Neutrality	<ul style="list-style-type: none"> Developments will demonstrate a commitment to water management and mitigate adverse impacts on water quality including pollution risks to groundwater, surface water and associated eco systems in accordance with Policy SE5. Developments located within designated nitrate vulnerable zones or in close proximity to sensitive water bodies should achieve nutrient neutrality in accordance with Policy SE5.
Biodiversity Net Gain	<ul style="list-style-type: none"> Development will deliver a minimum of 10% net gain in biodiversity in accordance with Policy SE7.

Highways Transport and Travel

Local Plan Transport Study and Mitigation	<ul style="list-style-type: none"> A transport study and associated modelling has been undertaken to assess the cumulative impact of the proposed Local Plan allocations on the transport network. Overall, the study has concluded that the cumulative impact of development is not significant. Strategic transport mitigation measures that are necessary are set out in site-specific allocation policies.
Transport Assessments and Travel Plans	<ul style="list-style-type: none"> Transport assessments and Travel Plans will be required for developments likely to generate significant travel movements in accordance with the requirements set out in Policy IN2.
Transport Infrastructure	<ul style="list-style-type: none"> Improvements in transport infrastructure will be required in accordance with Policies IN1, IN2 and IN3. This may require delivery of transport infrastructure improvements or financial contributions where appropriate.
Access and Parking	<ul style="list-style-type: none"> The layout and design of developments will accord with the principles in Policies IN2 and IN3 incorporating sufficient levels of parking and associated infrastructure. This will accord with parking standards set out in Appendix 3 of this Plan.
Cycleways, Bridleways and Public Rights of Way	<ul style="list-style-type: none"> In accordance with Policies IN2 and IN4 developments will be required to establish and enhance connections to footpaths, cycleways, Public Rights of Way and wider networks.
Waterways	<ul style="list-style-type: none"> Development affecting waterways will include environmental improvements and support active travel links in accordance with Policy IN2.

Environmental Health

Pollution and Air Quality	<ul style="list-style-type: none"> Developments will incorporate mitigation measures that prevent or minimise pollution and impacts on air quality in accordance with Policy SE1.
Land Contamination	<ul style="list-style-type: none"> Development on land that is contaminated (or suspected of being contaminated associated with an historical land use) will require appropriate site investigation surveys and land contamination assessments in accordance with Policy SE2. Appropriate land remediation / mitigation measures and long-term monitoring plan will be required in accordance with Policy SE2. Development proposals in a Coal Mining Referral Area will prepare a risk assessment and mitigation plan in accordance with Policy SE2.
Amenity	<ul style="list-style-type: none"> Where relevant, noise impact assessments and or light pollution studies will be undertaken, and appropriate mitigation delivered in accordance with Policy SE12.
Construction Environmental Management Plan	<ul style="list-style-type: none"> For major development schemes, a construction management plan will be required to manage the construction activities associated with the development.

Flood Risk

Policy SA1: General Requirements

Flood Assessments / Surface Water Drainage Strategies	Risk	<ul style="list-style-type: none"> Developments will be required to undertake Flood Risk Assessments and Surface Water Drainage Strategies using the latest Strategic Flood Risk Assessment or latest Environment Agency mapping (in accordance with guidance from the Council and the Lead Local Flood Authority) and the requirements of Policy SE3. At the pre-application stage, the Council encourages engagement with the Environment Agency and the Lead Local Flood Authority where Flood Risk Assessments and Surface Water Drainage Strategies are required.
Flood Infrastructure	Risk	<ul style="list-style-type: none"> Where required, mitigation measures should be delivered in accordance with the SFRA / Environment Agency guidance and Policy SE3. Where appropriate and in accordance with SFRA guidance, developer contributions may be required to support flood defence infrastructure improvements and implementation of flood warning systems in accordance with Policy SE3.
Sustainable Drainage		<ul style="list-style-type: none"> Developments will manage and discharge surface water through a sustainable drainage system in accordance with the approach set out in Policy SE4. SuDs drainage strategies and maintenance plans must be prepared and submitted with planning applications in accordance with Policy SE4. As part of the pre-app process the Council encourages early engagement with the Lead Local Flood Authority and United Utilities / Seven Trent Water (and where relevant, Canal and Rivers Trust) regarding SuDs feasibility and design. Financial contributions may be required toward the long-term maintenance of SuDs in accordance with Policy SE4.

Utilities

Utilities Masterplan		<ul style="list-style-type: none"> Major developments will require a site-wide 'Utilities Masterplan' setting out the phasing of provision and co-ordinated engagement with service providers in accordance with Policy IN7.
Water and Wastewater		<ul style="list-style-type: none"> Developments will demonstrate sufficient infrastructure capacity / appropriate connections for surface water disposal, water supply and wastewater treatment in accordance with Policy IN7 and through engagement with relevant water companies. The Water Cycle Study (2024) includes evidence regarding where improvements in infrastructure capacity will be required.
Gas, Electricity and telecommunications		<ul style="list-style-type: none"> Developments will demonstrate sufficient infrastructure capacity / appropriate connections for gas, electricity and telecommunications in accordance with Policy IN7 and through engagement with providers.
Digital Infrastructure		<ul style="list-style-type: none"> Developers will be required to work with providers to ensure necessary digital infrastructure is delivered including broadband and associated infrastructure in accordance with Policy IN7.
Infrastructure Delivery		<ul style="list-style-type: none"> Where new or upgraded infrastructure is required to support development the Council will require developer contributions secured in accordance with Policies IN1 and IN7.
Water Mains		<ul style="list-style-type: none"> Where water mains cross a development site an assessment of condition and status will be required to inform an appropriate strategy regarding easements or diversion.
Overhead Pylons		<ul style="list-style-type: none"> Where overhead pylons cross a development site this will influence the layout and design of development. Submission of an appropriate strategy regarding approach to power lines will be required.

Infrastructure

Delivering Infrastructure		<ul style="list-style-type: none"> Development will contribute to the provision of new infrastructure required to support sustainable development in accordance with Policy IN1.
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Minerals

Mineral Safeguarding Areas		<ul style="list-style-type: none"> Development located partially or wholly within a Mineral Safeguarding Area should undertake a minerals resource assessment. Consideration should be given to the requirements of the Staffordshire Minerals Plan and Policy 3 Safeguarding Minerals of Local and National Importance and Important Infrastructure. Engagement will be required with Staffordshire County Council.
Coal Mining		<ul style="list-style-type: none"> A Coal Mining Risk Assessment will be required for sites in identified Development High Risk Area. This should identify coal mining features present and the risks posed. It should also set out any investigatory works and the remedial or mitigation measures needed.

Green Belt

Policy SA1: General Requirements

Green Belt Compensatory Measures / Green Belt Boundaries	<ul style="list-style-type: none"> Site allocations that involve removing land from the Green Belt will provide compensatory improvements to the remaining Green Belt. These sites will also establish a recognisable and permanent new boundary to the Green Belt. These measures will be agreed with the Council as part of the preparation of site wide master planning and informed by the Green Belt Study, Landscape Study / landscape assessments, Open Space and Green Infrastructure Strategy, and biodiversity / recreational needs assessments. The scope of compensatory improvements will also be informed through early engagement with relevant landowners, key stakeholders and the local community. Compensatory measures will be secured as appropriate through the use of conditions / section 106 obligations and the community infrastructure levy. Compensatory improvements to the environmental quality and accessibility of remaining Green Belt land may include: <ul style="list-style-type: none"> New or enhanced green infrastructure; Woodland planting; Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal); Improvements to biodiversity, habitat connectivity and natural capital; New or enhanced walking and cycle routes; and Improved access to new, enhanced or existing recreational and playing field provision.
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	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SA1	+	+	++	+	++	++	+	+	+	++	+	0

G.11.1.1 Policy SA1 sets out the strategic requirements for site allocations proposed within the Plan (see **Appendix J** for the SA assessment of site-specific policies). The policy outlines that major site allocations (10 or more dwellings or 0.5 hectares or more) will need to be accompanied by site-wide master plans, that cover the broad location, quantum of development, range of uses, layout and design, and key infrastructure. Furthermore, allocated sites will be required to consider the aims, objectives and relevant policies of Neighbourhood Plans where applicable.

G.11.1.2 Policy SA1 will ensure that affordable housing is provided, and that development will be of an appropriate mix of housing and densities, and comply with accessibility standards. A major positive impact on equality is identified (SA Objective 10).

G.11.1.3 Developments will be required to undertake Flood Risk Assessments and Sustainable Water Drainage Strategies, alongside contributions to support flood defence infrastructure improvements and implementation of flood warning systems. Developments under the policy will include a commitment to water management to mitigate the adverse impacts on water quality, including the pollution risks to groundwater and will need to demonstrate appropriate infrastructure for water disposal, water supply and wastewater treatment.

- These measures and the provision of GI that will store, filter and reuse water, are expected to result in a major positive impact on flooding and water quality (SA Objectives 5 and 6).
- G.11.1.4 The policy will require development to be designed in accordance with standards for sustainable construction and be energy efficient, requiring major developments to provide an energy statement that will demonstrate use of onsite renewable energy for at least 10% of energy needs. These requirements will be likely to reduce GHG emissions from new developments. A minor positive impact is identified for climate change mitigation (SA Objective 1).
- G.11.1.5 Additionally, it is required that proposed development incorporates mitigation measures that will prevent or minimise pollution or impacts on air quality, potentially providing cleaner air for local residents. A minor positive impact on air pollution and health is identified (SA Objectives 2 and 9).
- G.11.1.6 Development will provide green and blue infrastructure, contributing to the enhancement of the wider network including habitats and ecological corridors, enabling the movement of species through the proposed development. The provision of green space will also be likely to encourage existing and future residents to lead more active lifestyles and will benefit from the associated health and wellbeing benefits of open space, therefore providing further benefits to SA Objective 9. Additionally, sites will be required to achieve a mandatory net gain in biodiversity in accordance with Policies SE7 and IN1. Under the policy, watercourses will also be enhanced alongside their associated habitats. A major positive impact on biodiversity is likely (SA Objective 3).
- G.11.1.7 Policy SA1 states that a transport study has been undertaken to assess the impact of the proposed developments on the surrounding transport network; new developments must accord with the recommendations and mitigation measures identified, where relevant. Furthermore, sites are required to enhance the transport and accessibility options of the area, through improvements to transport infrastructure or financial contributions, including enhancements to footpaths, cycleways and the PRoW network. These requirements will encourage the uptake of sustainable transport and active modes of travel, and potentially contribute towards reduced reliance on private car use. A minor positive impact is identified for transport and accessibility (SA Objective 11).
- G.11.1.8 Under the policy, development will be of high design quality and in keeping with the surrounding landscape character. Furthermore, the policy will ensure development proposals retain and enhance historic assets and their settings. Therefore, the policy could potentially have a minor positive impact on the historic environment and landscape character (SA Objectives 7 and 8).
- G.11.1.9 The policy will ensure that where proposed development sites are located within a Mineral Safeguarding Area (MSA), a minerals resource assessment is carried out; such assessments are anticipated to determine the viability and practicability of extraction of minerals prior to development. In accordance with Policy 3 of the adopted Minerals Local Plan for Staffordshire²⁰, this will ensure non-minerals development within MSAs will not

²⁰ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/mineralsLocalPlan.aspx> [Date accessed: 12/06/24]

adversely affect “*the existence, the quantity, the quality and the value of the underlying or adjacent mineral resource*”. Overall, Policy SA1 is identified to have a minor positive effect on the conservation of mineral resources.

- G.11.1.10 Policy SA1 is not expected to directly affect the economy or employment opportunities (SA Objectives 4 and 12).

Appendix H: Pre and Post Mitigation Assessments of All Reasonable Alternative Sites

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H.1 Introduction

H.1.1 Preface

- H.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through emerging Local Plan policies.
- H.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.
- H.1.1.3 The post-mitigation assessment considers how mitigating factors, including Local Plan policy and other guidance, will help to avoid or reduce the impacts that were identified at the pre-mitigation stage.
- H.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.
- H.1.1.5 **Chapter H.2** sets out the pre-mitigation impacts of all reasonable alternative sites considered throughout the SA process, and **Chapter H.3** provides detail on the mitigation within the Local Plan, and the post-mitigation impacts for these reasonable alternative sites.

H.2 Pre-mitigation assessment

H.2.1 Introduction

H.2.1.1 At the previous stage of plan making, a total of 141 reasonable alternative sites were identified by the Council within Newcastle-under-Lyme Borough and evaluated within the Regulation 18 Sustainability Appraisal (SA) (2023)¹.

H.2.1.2 Following the Regulation 18 'First Draft Plan' consultation in 2023, a further 27 reasonable alternative sites have been identified by the Council, including:

- 22 sites to be considered for residential use;
- One site to be considered for employment use; and
- Four sites to be considered for Gypsy and Traveller use.

H.2.1.3 In addition to the 27 sites identified at the Regulation 19 stage, the Council have provided updated information for six reasonable alternative sites originally assessed in the Regulation 18 SA. One of these amended sites (SP11) has now been split into four separate sites (SP11(1), SP11(2), SP11(3) and SP11(4)), giving a total of nine amended sites as follows:

- Seven sites to be considered for residential use;
- One site to be considered for employment use; and
- One site to be considered for mixed use.

H.2.1.4 These 27 additional and nine amended reasonable alternative sites have been evaluated within the Regulation 19 SA, pre-mitigation, and presented in **Appendix F**, based on the same methodology as those assessed at the Regulation 18 stage.

H.2.1.5 A total of 177 reasonable alternative sites have therefore been identified, described and evaluated in the SA process to date.

H.2.1.6 **Table H.2.1** presents the pre-mitigation impact matrix for all 177 reasonable alternative sites considered throughout the preparation of the Local Plan, and supersedes the comparable table (Table 7.3) presented in the Regulation 18 SA (2023).

¹ Lepus Consulting (2023) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan including Strategic Environmental Assessment and Equality Impact Assessment, Volumes 1-3, May 2023.

Table H.2.1: Impact matrix of all reasonable alternative site assessments pre-mitigation²

Site ref	SA stage	SA1 Climate Change	SA2 Air	SA3 Biodiversity, Flora & Fauna	SA4 Natural Resources & Waste	SA5 Flooding	SA6 Water	SA7 Cultural Heritage	SA8 Landscape	SA9 Health & Wellbeing	SA10 Equality	SA11 Transport & Accessibility	SA12 Economy
AB2	R18	+	-	-	--	--	-	0	--	-	0	-	++
AB2	R19	+	-	-	--	--	-	0	--	-	++	-	++
AB4	R18	+	-	-	-	+	-	0	--	-	++	-	+
AB12	R18	-	0	-	-	-	+/-	0	--	-	++	-	0
AB15	R18	+/-	0	+/-	-	-	+/-	0	--	-	+	-	0
AB16	R18	-	0	-	--	--	+/-	-	--	--	++	-	0
AB22	R18	+	0	-	-	--	+/-	0	--	-	++	-	0
AB24	R19	+	0	-	-	+	-	0	--	-	+	-	0
AB27	R18	+	0	-	-	+	+/-	0	-	-	+	-	0
AB30	R18	+	0	-	-	-	+/-	0	--	-	++	-	+
AB32	R18	+	0	-	-	-	+/-	-	--	-	+	-	0
AB33	R18	-	0	+/-	-	--	+/-	-	--	-	+	-	0
AB34	R18	-	0	-	-	+	-	0	--	-	++	-	0
AB37	R18	-	0	--	-	--	-	-	--	-	++	-	0
AB72	R18	+	0	-	-	+	+/-	0	--	-	+	-	0
AB73	R18	+	0	-	-	+	+/-	0	--	-	+	-	0
AB75	R18	+	0	-	-	--	+/-	0	--	-	++	-	+
AB77	R18	+	0	-	--	-	-	-	--	-	++	-	++
AB78	R18	+	-	+/-	-	-	-	-	--	-	+	-	0
AB79	R18	+	0	-	-	--	-	-	--	-	++	-	0
HD26	R18	+	0	-	-	-	+/-	0	-	-	+	-	-
HM8	R18	+/-	-	-	-	-	+/-	0	--	-	++	-	0
HM10	R18	+/-	0	-	-	-	+/-	0	--	-	+	-	0
HM15	R18	+	0	--	-	+	+/-	0	-	-	+	-	0
HM20	R19	+	0	-	-	-	+/-	0	--	-	+	-	0
HM22	R18	+	0	-	-	+	+/-	0	--	-	+	-	0
HM23	R19	+	0	-	-	+	+/-	0	--	-	+	-	0

² Please note that corrections have been made to this table since the version presented in the Regulation 18 SA Report regarding the following sites:

- The proposed development (reconfiguration of flats into houses) at Site CH13 will result in the loss of seven dwellings, rather than 19 as stated in the Regulation 18 SA, leading to a minor negative impact against SA Objective 10 rather than a major negative impact.
- The latest Green Belt Site Review information from 2024 has highlighted a number of changes to the evaluation of reasonable alternative sites within SA Objective 8: Landscape in terms of the overall contribution of the sites to the purposes of the Green Belt (see full methodology details in **Appendix E**). This does not affect the overall assessment findings for the majority of sites, however this has resulted in changes to the overall scoring for SA Objective 8 for four sites:
 - o Sites HD26 and TK18 – minor negative rather than major negative effect for SA Objective 8 overall;
 - o Sites HM22 and MD20 – major negative rather than minor negative effect for SA Objective 8 overall.

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HM62	R19	+/-	0	-	-	-	+/-	0	--	-	+	-	0
HM63	R19	+	0	+/-	-	+	+/-	0	--	-	+	-	0
HM66	R18	+	0	-	-	--	+/-	0	--	-	+	-	0
CL6	R18	+/-	0	+/-	-	-	+/-	0	+	-	+	-	0
CL8	R18	+	-	-	-	-	+/-	-	--	-	+	-	0
SB12	R18	+/-	-	-	++	+	+/-	-	-	-	+	-	0
CT1	R18	+	-	-	-	-	+/-	0	-	-	++	-	0
CT1	R19	+	-	-	-	-	+/-	0	-	-	++	-	0
CT10	R18	+/-	0	--	-	-	+/-	0	-	--	++	-	+
CT20	R18	+/-	0	--	-	-	+/-	0	-	-	0	-	+
CT21	R19	+/-	0	-	-	-	+/-	0	+	-	+	-	0
CT25	R18	+	0	-	-	+	+/-	-	--	-	++	-	0
HD10	R19	+	0	--	-	--	+/-	0	-	--	0	-	+
CH3	R18	-	0	+/-	++	-	+/-	0	-	--	++	-	0
CH13	R18	+/-	0	+/-	-	--	+/-	0	+	--	-	-	0
CH14	R18	-	0	+/-	+	-	+/-	0	+	-	-	-	-
KS3	R18	-	0	-	-	--	+/-	0	-	-	++	-	0
KS11	R18	+/-	0	+/-	-	+	+/-	0	+	-	-	-	-
KS17	R18	-	0	+/-	-	-	+/-	0	-	-	+	-	-
KS18	R18	+/-	0	+/-	-	+	+/-	0	+	-	+	-	0
KS19	R18	+/-	0	-	-	+	+/-	0	+	-	-	-	0
WS9	R19	-	-	-	-	-	+/-	0	-	-	+	-	0
KL9	R18	+	-	-	-	-	+/-	-	--	-	++	-	0
KL12	R18	+/-	-	--	-	+	+/-	-	--	-	+	-	0
KL13	R18	+	-	--	--	--	+/-	--	--	-	++	-	+/-
KL14	R18	+	0	--	--	-	+/-	--	--	-	+	-	+/-
KL15	R18	+	-	-	-	-	+/-	-	--	-	++	-	++
KL20	R18	+	-	-	-	+	+/-	0	--	-	+	-	0
KL21	R18	+	-	-	--	-	+/-	-	--	-	++	-	++
KL22	R19	+	-	-	-	+	+/-	0	--	-	+	-	0
KL33	R18	+	0	+/-	++	+	+/-	-	--	-	+	-	0
KL34	R18	+	0	-	-	-	+/-	-	--	-	++	-	0
BL31	R19	+	-	-	-	--	+/-	-	--	-	+	-	+/-
KG6	R18	+/-	-	+/-	-	--	+/-	0	+	-	+	-	0
KG26	R18	+/-	0	+/-	-	+	+/-	0	+	-	+	-	0
RC4	R18	+/-	-	+/-	-	--	+/-	-	+	-	+	-	0
RC8	R18	+/-	-	--	-	--	+/-	0	+	-	+	++	0
RC11	R19	+	-	--	-	--	+/-	-	-	-	++	-	0
LW14	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW23	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW27	R18	+/-	0	+/-	-	+	-	0	--	-	+	-	0
LW29	R18	+/-	0	-	-	+	-	0	--	-	+	-	0
LW30	R18	+/-	0	-	-	+	-	0	--	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
LW41	R18	+/-	0	-	-	-	+/-	0	--	-	+	-	0
LW49	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW53	R18	+/-	0	-	-	+	-	0	--	-	++	-	0
LW54	R18	+/-	-	--	-	--	-	-	--	-	++	-	0
LW81	R18	+/-	0	-	-	+	-	-	--	-	+	-	0
LW82	R18	+/-	0	--	-	--	-	0	--	-	+	-	0
LW87	R18	+/-	-	-	-	+	+/-	0	--	-	+	-	-
HM4	R18	+/-	-	-	-	-	+/-	-	--	-	+	-	0
HM7	R19	+/-	-	-	-	-	+/-	-	--	-	+	-	0
HM28	R18	+/-	-	-	-	+	+/-	-	--	-	+	-	0
HM29	R18	+/-	-	-	-	+	+/-	-	--	-	+	-	0
MD2	R18	+	-	-	-	+	+/-	0	-	-	+	-	-
MD5	R18	+/-	-	-	-	--	+/-	0	-	--	+	-	0
MD11	R18	+	0	--	-	--	+/-	0	-	-	+	-	+/-
MD12	R18	+	-	--	-	--	+/-	-	-	-	++	-	++
MD13	R18	+	0	-	-	--	+/-	-	--	-	++	-	0
MD18	R18	+	0	-	-	--	+/-	-	--	-	+	-	0
MD19	R18	+	0	-	-	-	+/-	-	--	-	+	-	0
MD20	R18	+	-	-	--	--	+/-	-	--	-	++	-	+/-
MD25	R18	+/-	-	-	-	--	+/-	-	-	-	+	-	0
MD29	R18	+/-	-	-	-	--	+/-	-	-	-	+	-	0
MD29	R19	+/-	-	-	-	--	+/-	-	-	-	++	-	0
MD30	R18	+/-	-	-	-	-	+/-	0	-	-	+	-	0
MD32	R18	+/-	0	-	-	--	+/-	0	-	-	+	-	0
MD33	R18	+/-	-	-	-	-	+/-	-	-	-	++	-	0
MD34	R18	+	0	-	-	+	+/-	0	-	-	+	-	0
MD39	R18	+/-	-	-	-	+	+/-	-	-	-	+	-	0
MD40	R18	+/-	0	-	-	+	-	0	-	-	++	-	0
MD56	R18	+	-	--	-	-	+/-	-	-	-	+	-	0
LW6	R18	+/-	-	--	-	-	-	0	--	-	++	-	+
LW7	R18	+	-	-	-	+	+/-	-	--	-	+	-	0
LW9	R18	+/-	-	+/-	-	+	-	-	--	-	+	-	0
LW24	R19	+/-	0	-	+	+	-	0	--	-	+	-	0
LW38	R18	+/-	-	-	-	+	-	-	--	-	+	-	0
LW42	R18	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW48	R18	+/-	-	--	-	+	-	0	--	-	++	-	0
LW74	R18	+/-	-	-	-	+	-	-	--	-	+	-	-
LW78	R18	+/-	-	-	-	+	-	-	--	-	+	-	0
LW83	R18	+/-	0	+/-	-	-	+/-	0	-	-	+	-	0
LW84	R18	+/-	-	+/-	-	+	-	-	--	-	+	-	0
LW86	R18	+/-	-	-	-	+	-	-	--	-	+	-	+/-
LW91	R19	+/-	0	+/-	-	-	+/-	-	--	-	++	-	0
NC5	R19	+	0	-	-	-	+/-	0	-	-	++	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
NC13	R18	+	0	-	-	--	+/-	0	-	-	+	-	0
NC77	R18	+	-	-	-	--	+/-	-	--	-	+	-	+
NC78	R18	+	-	-	-	--	+/-	-	--	-	++	-	0
NC80	R18	+	0	-	-	-	+/-	-	--	-	++	-	0
NC81	R18	+	0	-	-	-	+/-	0	--	-	+	-	0
NC83	R18	+	0	-	-	--	+/-	0	-	-	+	-	0
SP2	R18	+/-	0	-	-	+	+/-	0	-	-	++	-	-
SP11	R18	+	-	--	-	-	+/-	-	--	-	+	-	-
SP11(1)	R19	+	-	-	-	-	+/-	-	--	-	++	-	+/-
SP11(2)	R19	+	-	--	-	-	+/-	-	--	-	++	-	+/-
SP11(3)	R19	+	0	-	-	-	+/-	-	--	-	++	-	+/-
SP11(4)	R19	+	0	-	-	+	+/-	-	--	--	++	-	+/-
SP12	R18	+	0	-	-	+	+/-	0	--	-	++	-	0
SP14	R18	+	-	--	-	-	+/-	-	--	-	+	-	0
SP22	R18	+/-	0	+/-	-	--	+/-	-	+	-	++	-	0
SP23	R18	+	-	-	-	+	+/-	-	--	-	0	-	0
SP23	R19	+	-	--	-	+	+/-	-	--	-	++	-	0
BW1	R19	+	-	-	-	--	+/-	0	-	-	++	-	+
BL3	R18	+/-	-	--	-	--	+/-	--	-	-	++	-	0
BL4	R19	+/-	-	--	-	--	+/-	-	-	-	+	-	0
BL8	R18	+/-	0	-	-	--	+/-	0	-	-	++	-	+
BL18	R18	-	-	--	-	--	+/-	0	-	-	+	++	0
BL18	R19	-	-	--	-	--	+/-	0	-	-	0	++	0
BL24	R18	+/-	-	+/-	-	--	+/-	0	+	-	+	-	0
BL32	R18	+/-	-	-	-	--	+/-	0	-	-	+	-	+
TK6	R18	-	0	+/-	-	--	+/-	0	-	-	++	-	0
TK10	R18	+	0	-	-	+	+/-	-	--	-	+	-	0
TK17	R18	+	-	-	-	-	+/-	-	-	-	++	-	0
TK18	R18	+	-	--	-	--	-	0	-	-	+	-	++
TK24	R18	+	0	-	-	--	+/-	-	-	-	++	-	0
TK25	R18	+	0	--	-	-	+/-	-	--	-	+	-	++
TK27	R18	+	0	-	-	-	+/-	-	-	-	+	-	0
TK29	R19	+	-	-	-	-	+/-	0	-	-	++	-	0
TK30	R18	+	-	--	-	--	+/-	-	-	-	0	-	++
TK45	R18	+	-	--	-	-	+/-	0	--	--	++	-	+
TK46	R18	+	-	--	-	--	-	0	--	-	0	-	0
TK47	R18	+	-	--	--	-	+/-	0	--	-	+	-	++
TB6	R18	+/-	-	+/-	-	+	+/-	0	+	-	++	-	0
TB19	R18	+	-	--	--	--	+/-	-	--	-	++	-	++
TB23	R18	+/-	-	-	-	--	+/-	0	-	-	+	-	0
TB24	R18	+/-	-	--	-	+	+/-	0	--	-	+	-	0
MB12	R18	+/-	-	+/-	-	+	+/-	0	-	++	+	-	0
MB13	R18	+/-	-	-	+	+	+/-	-	+	++	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
MB15	R18	+/-	-	+/-	+	+	+/-	-	+	++	+	-	0
TC7	R18	-	-	+/-	-	-	+/-	-	+	++	+	-	+
TC19	R19	+/-	-	+/-	-	+	+/-	-	+	++	+	-	-
TC20	R19	+/-	-	+/-	-	+	+/-	-	+	++	+	-	+/-
TC22	R18	+/-	-	+/-	-	+	+/-	-	+	++	+	-	+
TC40	R18	+/-	-	+/-	-	+	-	0	+	++	0	-	0
TC45	R18	+/-	-	-	-	-	+/-	-	+	++	+	-	+/-
TC50	R19	+/-	-	+/-	++	+	+/-	-	+	++	+	-	+/-
TC52	R19	+/-	-	+/-	-	-	+/-	-	+	++	++	-	+/-
TC71	R19	+/-	-	+/-	-	+	+/-	-	+	++	+	-	-
Site 1	R18	+/-	-	--	-	+	-	0	-	-	+	-	0
Site 2	R18	+/-	0	--	-	-	+/-	0	-	-	+	-	0
Site 3	R18	+	0	-	-	--	+/-	0	--	-	+	-	0
Site 4	R18	+/-	0	--	-	-	+/-	0	-	--	+	-	0
Site 5	R18	+	-	-	-	+	+/-	-	--	--	+	-	0
Site 6	R18	+/-	-	--	-	--	+/-	0	+	--	+	++	0
Site 7	R18	+/-	-	+/-	-	+	+/-	0	-	-	+	-	0
Site 8	R19	+/-	0	-	-	-	+/-	0	-	-	+	-	0
Site 9	R19	+/-	0	--	-	--	-	0	-	++	+	-	0
Site 10	R19	+/-	0	-	-	--	+/-	0	-	--	+	-	0
Site 11	R19	+/-	-	-	-	--	-	-	+	-	++	++	+/-

H.3 Mitigating effects of Local Plan policies

H.3.1 Introduction

- H.3.1.1 A total of 55 policies are proposed as part of the Newcastle-under-Lyme Local Plan (see **Appendix G**). The policies are anticipated to improve the sustainability performance of many of the reasonable alternative site assessments through the reduction or elimination of adverse effects and optimising positive effects.
- H.3.1.2 It should be noted that the requirements of the 45 site-specific allocation policies set out in the Local Plan (and appraised in **Appendix J**) have not informed the post-mitigation assessments as these do not relate to all reasonable alternative sites.
- H.3.1.3 **Tables H.3.1 to H.3.12** below set out the potential adverse impacts that have been identified through the assessment of sites pre-mitigation for each SA Objective, as presented in **Table H.2.1**, and indicate which, if any, of the emerging Local Plan policies would be likely to mitigate these effects.
- H.3.1.4 The assessment of the sustainability performance of sites post-mitigation, taking into account the mitigating effects of the Local Plan policies, is summarised in the matrix in **Table H.4.1**.

Table H.3.1: Likely adverse effects and policies for potential for mitigation on SA1: Climate Change

SA OBJECTIVE 1: CLIMATE CHANGE
Identified adverse effects on climate change
<ul style="list-style-type: none"> • Greenhouse gas (GHG) emissions: It is likely that new development will result in an increase in local GHG emissions due to the increase in the local population and the number of operating businesses. The increase in GHG emissions caused by new developments is often associated with impacts of the construction phase, the occupation and operation of homes and businesses, fuel consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible. • Renewable energy generation: A small number of reasonable alternative sites are situated in locations where new development may sterilise land with high potential for renewable energy schemes.
Policies for mitigation of potential adverse effects associated with climate change
<ul style="list-style-type: none"> • Policy SE1: Pollution and Air Quality will ensure that the cumulative effects of emissions from proposed developments are considered, which could help to reduce air pollutants including GHGs. • Policy CRE1: Climate Change, supported by SA1: General Requirements, will ensure that development contributes towards the mitigation of, and adaptation to climate change, ensuring net zero national targets are met. The policy will ensure development proposals are of sustainable design by improving energy efficiency and utilising low carbon or renewable energy sources. Furthermore, the policy requires developments to include green and blue infrastructure (GI and BI), seeking opportunities to enhance ecosystem services such as carbon sequestration. • Policy CRE2: Renewable Energy promotes climate change resilience, encouraging the use of low-carbon and renewable energy sources, reducing the reliance on energy produced from fossil fuels. An energy statement will be required for major development proposals, ensuring 10% of energy is from renewables. • Policies IN1: Infrastructure, IN2: Transport and Accessibility and IN4: Cycleways, Bridleways and Public Rights of Way promote measures to reduce the need to travel and encourage the uptake of sustainable transport options, as well as the development of walkable neighbourhoods, which are likely to contribute to climate change mitigation through reduced transport-associated GHG emissions. • Various Local Plan policies, including Policies PSD7: Design, SE14: Green and Blue Infrastructure, SE8: Biodiversity and Geodiversity and SA1: General Requirements include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as filtration of air pollutants including GHGs. • Policies RET4: Newcastle-under-Lyme Town Centre and RET5: Kidsgrove Town Centre promote sustainable and active travel initiatives, which could help to mitigate climate change through encouraging less reliance on private car use and lead to a reduction in transport-associated GHG emissions. • Policy SE11: Trees, Hedgerows and Woodland includes the restoration and enhancement of trees, hedgerows and woodland and Policy SE13: Soil and Agricultural Land promotes the conservation of soil resources, both of which will protect and increase carbon capture and storage functions. Enhanced carbon storage can help to mitigate anthropogenic climate change.
Commentary: Will the policies mitigate the identified adverse effects?
<ul style="list-style-type: none"> • GHG emissions: NO X Although these policies are likely to reduce the GHG emissions associated with development to some extent, the policies are not expected to fully mitigate the increased carbon emissions expected as a result of the large scale of development proposed through the Local Plan during the Plan period. • Renewable energy generation: YES ✓ The Local Plan policies, in particular CRE2, will be expected to ensure that opportunities for the use and generation of renewable energy are

SA OBJECTIVE 1: CLIMATE CHANGE

sought where possible and that adverse effects associated with renewable energy schemes are minimised.

Table H.3.2: Likely adverse effects and policies for potential for mitigation on SA2: Air

SA OBJECTIVE 2: AIR

Identified adverse effects on air quality

- **Reduction in air quality:** Impacts on air quality may arise during construction and operation of different types of development. The proposed development within Newcastle-under-Lyme Borough will also be likely to increase the volume of traffic and traffic-related emissions within the Plan area with consequent adverse impacts on air quality.
- **Exposure to air pollution from Air Quality Management Areas (AQMAs):** A small number of reasonable alternative sites in Newcastle & Mow Cop, Town Centre, Madeley & Betley, and Kidsgrove clusters either coincide or are located within 200m of designated AQMAs. The proposed development could exacerbate air pollution issues in existing AQMAs and expose site end users to poor air quality.
- **Exposure to air pollution from main roads:** Several major roads pass through Newcastle-under-Lyme Borough including ring roads and intersections that lie within the boundary. A number of reasonable alternative sites lie within 200m of these major roads, where site end users are more likely to be exposed to higher levels of air pollution.

Policies for mitigation of potential adverse effects associated with air quality

- Policy **SE1: Pollution and Air Quality** states that “*development proposals that are likely to result in detrimental impacts on pollution, including on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts*”. The policy will ensure that the development will not worsen air quality within AQMAs and will consider the cumulative effects of emissions from proposed developments.
- Policy **CRE1: Climate Change** will encourage new developments to incorporate measures to improve energy efficiency and is likely to help reduce the demand for energy, potentially leading to lower emissions of air pollutants during construction and occupation of development. Furthermore, the policy requires developments to incorporate GI and BI, seeking opportunities to enhance ecosystem services such as carbon sequestration and air filtration, with further possible benefits for air quality.
- Policy **CRE2: Renewable Energy** promotes alternate renewable and low carbon technologies that can contribute towards reduced emissions of pollutants and improved air quality.
- Policy **IN2: Transport and Accessibility** will tackle air pollution issues by focusing on reducing the need to travel and by encouraging the uptake of sustainable transport options, which will be likely to result in improved air quality in Newcastle-under-Lyme.
- Policy **IN3: Access and Parking** supports the provision of electric vehicle infrastructure such as charging points, and secure bicycle storage, facilitating the uptake of low or zero emission vehicles and active travel.
- Policies **PSD7: Design**, **SE14: Green and Blue Infrastructure** and **SE8: Biodiversity and Geodiversity** include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as filtration of air pollutants and could potentially result in improvements to air quality.
- Policies **RET4: Newcastle-under-Lyme Town Centre** and **RET5: Kidsgrove Town Centre** promote sustainable and active travel initiatives, which could result in improvements to air quality due to reduced reliance on private car use and consequently lower emissions of associated air pollutants.
- Policy **SE11: Trees, Hedgerows and Woodland** includes the restoration and enhancement of trees, hedgerows and woodland which provide ecosystem services such as air filtration.

Commentary: Will the policies mitigate the identified adverse effects?

SA OBJECTIVE 2: AIR

- **Reduction in air quality and exposure to air pollution: NO X** The Local Plan policies will contribute towards general improvements in air quality within the borough; however, it is unlikely that the adverse effects associated with the exposure of site end users to poor air quality within or adjacent to AQMAs and main roads would be fully mitigated by these policies. Further interventions, such as the introduction of car-free zones, may be necessary to fully mitigate the effect of introducing new development, and associated traffic, into areas where baseline air quality is already poor.

Table H.3.3: Likely adverse effects and policies for potential for mitigation on SA3: Biodiversity, Flora and Fauna

SA OBJECTIVE 3: BIODIVERSITY, FLORA AND FAUNA

Identified adverse effects on biodiversity, flora and fauna

- **Threats and pressures to European sites:** New development within Newcastle-under-Lyme has the potential to have direct, indirect and in-combination impacts on the integrity of European sites within and surrounding the Plan area. These potential effects are explored in more detail in the Habitats Regulations Assessment, including consideration of impacts to European sites from recreation, urbanisation, changes in water quantity and quality, air quality, and impacts on functionally linked land.
- **Threats and pressures to nationally and locally designated sites:** There is potential for the introduction of new development to lead to increased development related pressures and threats, including through reductions in air quality and water quality/quantity, habitat fragmentation and recreational pressures on biodiversity sites such as Local Wildlife Sites (LWSs – both Biodiversity Alert Sites and Sites of Biological Importance) and Local Nature Reserves (LNRs).
- **Loss or degradation of geological sites:** Where proposed development sites coincide with Regionally Important Geological/ Geomorphological Sites (RIGS), there is potential for loss or degradation of the important geological features to occur.
- **Threats and pressures to Sites of Special Scientific Interest (SSSIs):** Several reasonable alternative sites lie either wholly or partially within an Impact Risk Zone (IRZ) which indicate that consultation is required with Natural England, highlighting possible negative impacts on nearby SSSI.
- **Loss or degradation of priority habitats and ancient woodland:** Potential adverse effects on ancient woodland have been identified in some locations, including for reasonable alternative sites which coincide or are located in close proximity to these woodlands. Additionally, a small proportion of reasonable alternative sites coincide with priority habitats, whereby the proposed development could result in habitat fragmentation and isolation of the wider ecological network.
- **Fragmentation of the ecological network and loss of distinctive habitats:** The proposed development could potentially result in loss or degradation of habitat distinctiveness within the borough as approximately half of the reasonable alternative sites coincide with locations that have been identified as being of 'medium', 'high' or 'very high' distinctiveness.

Policies for mitigation of potential adverse effects associated with biodiversity, flora and fauna

- Policy **SE7: Biodiversity Net Gain**, supported by **Policy IN1: Infrastructure**, requires development to deliver mandatory Biodiversity Net Gain (BNG) in line with national standards. The policy also encourages BNG to link with the emerging Nature Recovery Network and Local Nature Recovery Strategy, helping to conserve and enhance biodiversity within the borough.
- Policy **SE8: Biodiversity and Geodiversity** sets out the Council's strategy for conservation and enhancement of biodiversity, geodiversity and ecological networks in the borough. The policy sets out the requirement to follow the mitigation hierarchy, ensuring that loss of designated nature conservation and geological sites is avoided, mitigated or as a last resort, compensated.

SA OBJECTIVE 3: BIODIVERSITY, FLORA AND FAUNA

- Policies **SE14: Green and Blue Infrastructure**, **PSD7: Design**, **SE6: Open Space, Sports and Leisure Provision**, **CRE1: Climate Change** and **SA1: General Requirements** seek improved provision and connectivity of green/blue infrastructure, to retain and improve habitat connectivity and ecological corridors amongst built development. **Policy RET5: Kidsgrove Town Centre** supports the provision of green routes and pocket parks within the town, complementing the GI provisions in the other policies.
- Policy **SE1: Pollution and Air Quality** seeks to reduce air pollution and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition.
- Policy **SE4: Sustainable Drainage Systems** will benefit biodiversity by promoting Sustainable Drainage Systems (SuDS) that can be integrated into the blue and green infrastructure network.
- The protection or improvement of water quality as promoted by Policy **SE5: Water Resources and Water Quality** will be likely to have a positive impact on the local ecological network.
- Policy **SE10: Landscape** encourages the use of native species in landscaping schemes, and integration of developments with existing green and blue infrastructure networks.
- Policy **SE11: Trees, Hedgerows and Woodland** aims to create, retain and protect trees, hedgerows and woodlands, including ancient woodland and veteran trees across the Plan area. The policy will ensure that trees are only lost when unavoidable and that appropriate replacements are provided, and establish buffer zones between development and woodlands.

Commentary: Will the policies mitigate the identified adverse effects?

- **Threats and pressures to European sites: UNCERTAIN** These policies alone may not fully mitigate potential adverse impacts on European sites arising from all reasonable alternative sites. The emerging HRA will look into impacts of the Local Plan allocations on European sites in more detail including any required mitigation; the conclusions of the HRA will be fed into the evaluation of allocated sites within the main body of the Regulation 19 SA.
- **Threats and pressures to nationally and locally designated sites and habitats: YES ✓** The Local Plan policies are expected to mitigate potential adverse impacts on nationally and locally designated sites and habitats, and deliver a net gain in biodiversity for all development sites.
- **Fragmentation of the ecological network and loss of distinctive habitats: NO X** Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. The Local Plan policies are not expected to fully mitigate the potential loss of distinctive habitats, particularly where sites coincide with areas of 'high' or 'very high' distinctiveness or where the majority or entirety of sites coincide with priority habitats.

Table H.3.4: Likely adverse effects and policies for potential for mitigation on SA4: Natural Resources and Waste

SA OBJECTIVE 4: NATURAL RESOURCES AND WASTE

Identified adverse effects on natural resources and waste

- **Loss of previously undeveloped land and 'best and most versatile' (BMV) soil:** The majority of the reasonable alternative sites comprise previously undeveloped / greenfield land, either wholly or partially. Many of these sites coincide with 'very good' (Grade 2) or 'good to moderate' (Grade 3) quality agricultural land according to the Agricultural Land Classification (ALC), and as such, development at these locations could potentially have an adverse impact on the quality and extent of these soil resources. ALC Grade 2, and potentially Grade 3 (if found to be sub-grade 3a upon further assessment) could represent BMV agricultural land which would be lost as a result of the proposed development.
- **Sterilisation of mineral resources:** The majority of reasonable alternative sites coincide with Mineral Safeguarding Areas (MSAs) where there is potential for the proposed non-

SA OBJECTIVE 4: NATURAL RESOURCES AND WASTE

minerals development to lead to sterilisation of the underlying mineral resources, meaning that mineral resources will be inaccessible for potential extraction in the future.

- **Limited access to waste management facilities:** The majority of the reasonable alternative sites are located in areas with good access to waste management / recycling facilities, however, three sites are situated beyond the sustainable travel time of 30 minutes to these facilities, where site end users could potentially be discouraged from seeking sustainable management of household waste.

Policies for mitigation of potential adverse effects associated with natural resources and waste

- Policy **SE13: Soil and Agricultural Land** sets out protection for BMV land, requiring new development affecting land of ALC Grades 1, 2 and 3a to provide evidence that no suitable alternative sites on land of lower agricultural quality are available.
- Policy **PSD4: Development Boundaries and the Open Countryside** encourages the redevelopment and re-use of previously developed land and will only permit new development within the open countryside in specific circumstances. This will help to protect soil resources within these areas and promote an efficient use of land, minimising the loss of undeveloped land for new built development.
- Policies **PSD7: Design**, **SE14: Green and Blue Infrastructure** and **SE8: Biodiversity and Geodiversity** (supported by **SA1: General Requirements**) include provisions to enhance the provision and connectivity of GI/BI, which will help to protect underlying soil resources from erosion.
- Policy **CRE1: Climate Change** seeks to ensure that development proposals consider ways in which the "*design, construction, insulation, layout and orientation*" of developments can encourage the efficient use of natural resources, including encouraging opportunities for re-use of existing buildings.
- Policy **CRE2: Renewable Energy** promotes sustainable construction methods which utilise locally sourced and recycled materials, which could potentially help conserve of natural resources and minimisation of waste.
- Policy **SE2: Land Contamination** aims to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This policy could help to reduce the amount of development on previously undeveloped land, and therefore, reduce the loss of ecologically or agriculturally valuable soil resources.
- Policy **SE11: Trees, Hedgerows and Woodland** includes the restoration and enhancement of trees, hedgerows and woodland which help to protect the stability of underlying soil resources.
- Policy **SA1: General Requirements** will ensure that where proposed development sites are located within an MSA, a minerals resource assessment is carried out. This will be likely to ensure the conservation of mineral resources and ensure minerals are extracted prior to development, where viable and practicable, in accordance with the adopted Minerals Local Plan for Staffordshire.

Commentary: Will the policies mitigate the identified adverse effects?

- **Loss of previously undeveloped land and BMV soil:** **NO X** The majority of the reasonable alternative sites are located on Grades 2 or 3 ALC land, which is likely to comprise some of the borough's BMV agricultural land. Despite the positive provisions within the policies, these are not expected to mitigate adverse impacts on soil resources.
- **Sterilisation of mineral resources:** **YES ✓** Policy SA1 will ensure the requirements of the adopted Minerals Local Plan for Staffordshire are met in regard to development within MSAs.
- **Limited access to waste management facilities:** **YES ✓** Local Plan policies will be likely to help minimise the generation of waste, and set out a range of transport improvements which have potential to improve sustainable access to waste management facilities.

Table H.3.5: Likely adverse effects and policies for potential for mitigation on SA5: Flooding

SA OBJECTIVE 5: FLOODING

Identified adverse effects on flooding

- **Risk of fluvial or surface water flooding:** A small number of reasonable alternative sites are located within areas prone to the risk of fluvial flooding. This includes five sites where more than 10% of the site area falls within Flood Zones 2, 3a or 3b. The majority of reasonable alternative sites coincide with areas at varying risk of surface water flooding. Development at these locations will be likely to locate site end users in areas under risk of flooding, as well as exacerbate flood risk in surrounding locations.

Policies for mitigation of potential adverse effects associated with flooding

- Policy **SE3: Flood Risk Management** sets out the Council's approach to managing the risk of flooding and water resources within the borough. The policy, alongside **SA1: General Requirements**, will ensure that development proposals are informed by flood risk assessments, where appropriate, and sets out criteria that must be adhered to for different development scenarios in accordance with the Strategic Flood Risk Assessment (SFRA).
- Policy **SE4: Sustainable Drainage Systems** promotes the use of SuDS to manage surface water run-off and reduce the risk of surface water flooding, as well as encouraging opportunities to be sought for integrating multi-functionality.
- Several Local Plan policies, including Policies **PSD7: Design**, **CRE1: Climate Change**, **SE8: Biodiversity and Geodiversity**, **SE11: Trees, Hedgerows and Woodland** and **SE14: Green and Blue Infrastructure** will contribute towards improved provision and connectivity of green/blue infrastructure, which could help deliver benefits to fluvial and surface water flood risk through providing natural flood storage and drainage and reducing water runoff rates.
- Policies **IN1: Infrastructure** and **IN7: Utilities**, supported by **SA1: General Requirements**, seek to ensure that the Local Plan provides appropriate and proportionate infrastructure to deliver the proposed development including environmental infrastructure, along with other infrastructural provisions and utilities including surface water disposal and wastewater treatment. This will contribute towards flood management in the borough.

Commentary: Will the policies mitigate the identified adverse effects?

- **Risk of fluvial or surface water flooding: YES ✓** Assuming that the Sequential Test is passed, or the Exception Test is applied where required, and in line with the recommendations of the emerging Level 1 SFRA (2024), the SFRA process combined with the Local Plan policies is expected to mitigate potential adverse impacts associated with development in areas at risk of fluvial or surface water flooding.

Table H.3.6: Likely adverse effects and policies for potential for mitigation on SA6: Water

SA OBJECTIVE 6: WATER

Identified adverse effects on water

- **Risk of contamination of groundwater Source Protection Zones (SPZ):** A small number of reasonable alternative sites coincide with groundwater SPZ, where there is potential for new development to result in increased pollution of groundwater resources.
- **Risk of contamination of watercourses:** A small number of reasonable alternative sites lie within 10m of a watercourse, where there is a likelihood of adverse effects on water quality occurring associated with construction activities in or near watercourses, with potential impacts upon the bed and banks of rivers. New development across the borough has potential to lead to cumulative adverse impacts on the quality of watercourses owing to increased runoff of pollutants.

Policies for mitigation of potential adverse effects associated with water

- Policy **SE5: Water Resources and Water Quality** seeks to conserve, and where possible enhance, the quality of watercourses, aquatic habitats and groundwater, ensuring

SA OBJECTIVE 6: WATER

development takes into account the objectives of the Water Framework Directive and considers capacity limitations that are outlined within the Water Cycle Study, ensuring adequate water supply and management of water resources.

- Policy **SE8: Biodiversity and Geodiversity** will ensure that where development is likely to have an adverse effect on European sites with regard to water quality or quantity, appropriate mitigation is secured. Furthermore, this policy and others including Policies **PSD7: Design, CRE1: Climate Change, SE11: Trees, Hedgerows and Woodland** and **SE14: Green and Blue Infrastructure** include provisions to enhance the provision and connectivity of GI/BI, which will help to support ecosystem service functions such as natural filtration of water to improve water quality.
- Policies **IN1: Infrastructure** and **IN7: Utilities** (supported by **SA1: General Requirements**) seek to ensure that the Local Plan provides appropriate and proportionate infrastructure and utilities to deliver the proposed development including surface water disposal, water supply and wastewater treatment infrastructure. This will help to conserve water resources and protect water quality in the borough.
- Policy **IN2: Transport and Accessibility** includes reference to environmental improvements of the borough's waterways, which could serve to provide active travel corridors as well as enhancing water quality.
- Through seeking to reduce the likelihood and extent of flood events and ensure the sustainable management of flood water, Policies **SE3: Flood Risk Management** and **SE4: Sustainable Drainage Systems** are likely to lead to benefits for the quality of watercourses and groundwater resources.

Commentary: Will the policies mitigate the identified adverse effects?

- **Risk of contamination of groundwater SPZs and watercourses: YES ✓** Through ensuring new development is in accordance with the findings of the Water Cycle Study, the Local Plan policies will be likely to minimise potential adverse effects on watercourses and groundwater quality through protecting the quality of water runoff.

Table H.3.7: Likely adverse effects and policies for potential for mitigation on SA7: Cultural Heritage

SA OBJECTIVE 7: CULTURAL HERITAGE

Identified adverse effects on cultural heritage

- **Direct adverse effects on heritage assets:** A small number of reasonable alternative sites coincide with designated heritage assets, where there is potential for direct adverse impacts on the cultural heritage features. This includes Sites KL13 and KL14 which coincide with Keele Hall RPG, and Site BL3 which coincides with the Grade II Listed Building 'Wood Shutt Farmhouse'.
- **Alteration of character or setting of heritage assets:** The proposed development at several reasonable alternative sites which lie within or in close proximity to conservation areas, or in close proximity to designated heritage assets (Listed Buildings, RPGs or Scheduled Monuments) have been identified to potentially have an adverse impact on the setting or character of these cultural heritage assets.

Policies for mitigation of potential adverse effects associated with cultural heritage

- Policy **PSD7: Design** guides the design of new developments, ensuring that schemes are in accordance with the National Design Code as well as any local design codes or guidance. Effective design codes can help to ensure new developments are integrated into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets.
- Policy **SE9: Historic Environment** sets out the requirement for development proposals to avoid harm to designated and non-designated assets, seeking to "conserve and, where possible, enhance the significance of all heritage assets and their settings". The policy will ensure Heritage Assessments are carried out where there is potential for adverse effects to

SA OBJECTIVE 7: CULTURAL HERITAGE

occur, and encourages opportunities to better reveal the significance of heritage assets, and respect and enhance significant views.

- Policy **SA1: General Requirements** complements Policy SE9, and further requires potential effects on above and below ground archaeological features to be assessed, including through desk-based assessments and field evaluations, to inform the proposed development.
- Policy **SE10: Landscape** aims to ensure that development proposals are guided by the findings of the Landscape and Settlement Character Assessment (LSCA) and the Landscape Strategy to conserve and enhance the local landscape character and distinctiveness. The policy will be likely to conserve and enhance local landscape features, including elements of the historic environment, benefitting the overall landscape and historic character of the area.
- Policy **CRE1: Climate Change** encourages retrofitting historic buildings with measures to mitigate and adapt to climate change, where appropriate, which could help to improve the energy efficiency of historic buildings and encourage the conservation and renewal of cultural heritage assets.
- Policies **EMP3: Tourism** and **RUR1: Rural Economy** support development that will re-use, conserve and enhance the significance of farm buildings that could include historic buildings.
- Policies **RUR2: Rural Workers Dwellings**, **RUR3: Extensions and Alterations to Buildings Outside Settlement Boundaries**, **RUR4: Replacement Buildings Outside of Settlement Boundaries** and **RUR5: Re-use of Rural Buildings for Residential Use** seek to ensure that any such developments are of high-quality design and will conserve and enhance any affected historic assets and their settings.

Commentary: Will the policies mitigate the identified adverse effects?

- **Direct adverse effects on, and alteration of character/setting of, heritage assets:**
YES ✓ The Local Plan policies will be expected to mitigate the identified adverse effects on designated cultural heritage assets and ensure opportunities are sought to enhance the historic environment. It should however be noted that there has been limited information available to inform the assessment in terms of potential effects on locally important (non-designated) features within Newcastle-under-Lyme, and as such there is some uncertainty in the assessment for this SA Objective.

Table H.3.8: Likely adverse effects and policies for potential for mitigation on SA8: Landscape

SA OBJECTIVE 8: LANDSCAPE

Identified adverse effects on landscape

- **Effects on the Green Belt:** A total of 94 reasonable alternative sites lie within the Green Belt. Of these sites, 37 are located within land parcels which are identified in the Green Belt Assessment to make a 'moderate' overall contribution to the purposes of Green Belt and 29 sites are located in areas classed as making a 'strong' overall contribution to the purposes of the Green Belt.
- **Threaten or result in the loss of rural and locally distinctive landscape character:** The proposed development at the majority of reasonable alternative sites has potential to alter the characteristics of the local landscape, as identified for each Landscape Character Type within the Landscape and Settlement Character Assessment (LSCA) (2022). This includes loss of rural character, farmland, and changes to open views. Some 64 reasonable alternative sites are located in areas identified to be of 'medium' landscape sensitivity and 67 sites located in areas of 'high' landscape sensitivity according to the LSCA, where there is potential for the introduction of new development to significantly change the character of the landscape.
- **Increased risk of coalescence and urbanisation of the countryside:** Owing to the rural nature of the borough, and the location of many reasonable alternative sites outside of the existing settlement pattern, there is potential for development at the majority of sites to increase the risk of urbanisation of the countryside, and potential for coalescence between settlements for a small number of sites.

SA OBJECTIVE 8: LANDSCAPE

- **Change in views from Public Rights of Way (PRoW):** A number of reasonable alternative sites have potential to alter the views of a predominantly rural or countryside landscape experienced by users of the PRoW network.
- **Effects on important trees:** The proposed development at sites which coincide with or are located adjacent to trees which are registered under Tree Preservation Orders (TPOs) could have an adverse effect on these trees and their protected status, with implications for the appearance and character of the local landscape.

Policies for mitigation of potential adverse effects associated with landscape

- Policy **SE10: Landscape** will ensure that development proposals are guided by the findings of the Landscape and Settlement Character Assessment (LCSA) and the Landscape Strategy, and include measures to conserve and enhance the local landscape character and distinctiveness, and ensuring developments identify and protect key views to landmark features. Major developments will need to be accompanied by a Landscape and Visual Impact Assessment (LVIA).
- Policy **SE9: Historic Environment** will ensure development is informed by the Staffordshire Historic Landscape Characterisation and encourages opportunities for development proposals to enhance significant views.
- Policy **SE12: Amenity** will ensure that noise and light pollution and environmental disturbances are considered within new developments, thereby helping to protect tranquillity.
- Policy **PSD7: Design** will guide the design of developments and ensure that schemes are in accordance with both the National Design Code as well as integrating local design codes, thereby protecting local landscape features and local identity.
- Various Local Plan policies, including Policies **SE8: Biodiversity and Geodiversity**, **PSD7: Design**, **CRE1: Climate Change**, **SE11: Trees, Hedgerows and Woodland** and **SE14: Green and Blue Infrastructure** include provisions to enhance the provision and connectivity of GI/BI, which will be likely to improve the appearance and character of the local landscape. Policy SE11 will also ensure that trees are protected (or replaced where loss is unavoidable), and new trees planted, leading to an increase in overall canopy cover.
- Policy **RET1: Retail** will ensure that retail development proposals will be appropriate to the settlement, whereby developments "*reflect the role, function, and character of each centre in retail hierarchy*" which can ensure development aligns with surrounding landscape features and townscape character.
- Policies **RET4: Newcastle-under-Lyme Town Centre** and **RET5: Kidsgrove Town Centre** support enhancements to the public realm of the main towns, including measures to conserve and enhance the local character and townscape. Similarly, **Policy IN2: Transport and Accessibility** includes measures to enhance the vibrancy of town centres and provide an attractive public realm.
- Under Policy **PSD4: Development Boundaries and the Open Countryside** development proposals will be supported where they are in keeping with the surrounding landscape, role and scale of the settlement and therefore conserve and enhance landscape character.
- Policy **PSD5: Green Belt** will protect the retained Green Belt and its functions, including in preventing urban sprawl, which in turn can help to protect landscape character. The policy will ensure that development proposals for sites removed from the Green Belt deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt to offset adverse effects.
- Policy **SA1: General Requirements** promotes high design quality, incorporation of GI/BI and will ensure developments are informed by landscape appraisals where appropriate. The policy also sets out a range of compensatory improvements to the environmental quality and accessibility of the remaining Green Belt where sites are proposed to be released from the Green Belt; this includes new and enhanced GI, biodiversity improvements, landscape and visual enhancements, new walking routes and recreational provisions.

Commentary: Will the policies mitigate the identified adverse effects?

SA OBJECTIVE 8: LANDSCAPE

- **Effects on the Green Belt: NO X** The Green Belt Assessment and relevant Local Plan policies set out a range of compensatory measures to offset adverse effects to the purposes of the Green Belt where sites are released for development. However, the negative effects of the loss of the Green Belt to development are unlikely to be fully mitigated by these measures. Residual negative effects to the landscape as a consequence of the release of these sites for development are likely to remain to some extent.
- **Threaten or result in the loss of rural and locally distinctive landscape character: NO X** The nature of the effects of development on the landscape is highly dependent on local site circumstances and the nature of the development proposals. The Local Plan policies have the potential to mitigate some potential adverse effects on landscape character and visual amenity identified in this assessment, through sensitive masterplanning and design, and ensuring that development proposals are informed by an LVIA. However, the policies are unlikely to fully mitigate adverse effects associated with new development within areas of 'high' or 'medium' landscape sensitivity according to the LSCA, where some or many of the key characteristics and valued attributes of the landscape are highly susceptible to change as a result of new development.
- **Increased risk of coalescence and urbanisation of the countryside: NO X** Whilst the Local Plan policies are likely to reduce adverse effects on the landscape character to some extent, the policies would be unlikely to fully mitigate the risk of coalescence and urbanisation of the countryside, owing to the extent of development on greenfield land and previously undeveloped locations.
- **Change in views from PRoW: YES ✓** The Local Plan policies are expected to mitigate significant adverse effects on views.
- **Effects on important trees: YES ✓** The Local Plan policies are expected to ensure that trees are protected, new trees are planted, and any loss of trees is adequately compensated for.

Table H.3.9: Likely adverse effects and policies for potential for mitigation on SA9: Health and Wellbeing

SA OBJECTIVE 9: HEALTH AND WELLBEING

Identified adverse effects on health and wellbeing

- **Limited access to healthcare:** Sustainable access to healthcare is limited in some areas of Newcastle-under-Lyme, with the majority of reasonable alternative sites located beyond 5km from a hospital, and a slightly smaller proportion of sites beyond 800m from a GP surgery.
- **Limited access to leisure facilities:** The majority of reasonable alternative sites are located beyond 1.2km from leisure facilities, potentially limiting sustainable access to opportunities for leisure and recreation.
- **Limited access to greenspace:** Whilst the majority of reasonable alternative sites are located within the catchment of one or more freely accessible open spaces, according to the Accessible Natural Greenspace Standards (ANGSt), in some areas of Newcastle-under-Lyme sites are located outside of ANGSt catchments where access to greenspace is likely to be limited.
- **Loss of greenspace:** A small number of reasonable alternative sites coincide with existing freely accessible greenspaces, where there is potential for the proposed development to result in a net loss of greenspace across the borough.

Policies for mitigation of potential adverse effects associated with health and wellbeing

- Policy **PSD6: Health and Wellbeing** sets out the Council's intention to support healthy and active lifestyles, supporting the aims of the Staffordshire Joint Wellbeing Strategy, addressing health inequalities and providing access to leisure and healthcare services. The policy will ensure no unnecessary loss of open space or GI/BI resources as identified in the Open Space and Green Infrastructure Strategy.

SA OBJECTIVE 9: HEALTH AND WELLBEING

- Policy **SE6: Open Space, Sports and Leisure Provision** will help to ensure that local residents have access to open spaces, sports and leisure facilities and that the provision, enhancement and maintenance of such services is catered for to meet the local demand. Loss of green/open spaces will only be permitted where it is demonstrated that these are surplus to requirements or will be replaced by equal or enhanced provisions.
- Policy **IN1: Infrastructure** will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, which includes healthcare facilities.
- Policy **IN2: Transport and Accessibility** seeks to promote sustainable transport and promote improved connectivity to local services (including healthcare facilities) through a range of criteria for new development proposals.
- Policy **IN4: Cycleways, Bridleways and Public Rights of Way** will ensure appropriate design and layout of cycleways, bridleways and public rights of way (PRoW) and supports development that will improve the number and quality of opportunities for walking, cycling and riding.
- Under Policy **PSD7: Design**, development is guided to improve accessibility and connectivity to align with the Building for a Healthy Life (BHL) design toolkit, that includes provision of high-quality neighbourhoods which are well connected via active travel routes, with integrated open spaces and green/blue infrastructure.
- Policies **PSD2: Settlement Hierarchy** and **PSD3: Distribution of Development** will ensure that new housing development is delivered in accordance with the provision of and accessibility to key services, including healthcare and leisure facilities, with development being centred towards locations that have a higher capacity.
- Policy **CRE1: Climate Change** encourages development to be designed to promote walking and cycling, and to include provisions for enhanced GI/BI including allotments, increasing opportunities for outdoor activities and community cohesion.
- Policies **HOU2: Housing Mix and Density**, **HOU3: Housing Standards** and **HOU5: Specialist Needs Housing** will ensure that adaptable and accessible dwellings, and housing suitable for elderly people or those with specialist requirements, are catered for. By ensuring provision of suitable and safe housing, this could lead to benefits for health and wellbeing and reduced pressure on healthcare services.

Commentary: Will the policies mitigate the identified adverse effects?

- **Limited access to healthcare: NO X** The Local Plan policies could potentially help to prevent the loss of existing healthcare facilities and improve sustainable access to healthcare and leisure facilities for some residents, however, the policies are not expected to fully mitigate the restricted access to healthcare services, in relation to access to NHS hospitals and GP services, for many of the reasonable alternative sites.
- **Limited access to, and loss of, greenspace: YES ✓** Local Plan policies will ensure there is no net loss of greenspaces where these are in use by the local community, and are expected to improve the provision of and access to open space, sports facilities and GI/BI.

Table H.3.10: Likely adverse effects and policies for potential for mitigation on SA10: Equality

SA OBJECTIVE 10: EQUALITY

Identified adverse effects on equality

- **Growth in deprived areas:** A small number of reasonable alternative sites are located in Lower Super Output Areas (LSOAs) that fall within the 10% most deprived in England according to the Index of Multiple Deprivation (IMD). The proposed development at these locations could potentially exacerbate existing social pressures in the local area and increase demand on local services.
- **Loss of housing:** The proposed development at one reasonable alternative site (CH13) is identified to result in a net loss of housing owing to redevelopment of flats into houses.

SA OBJECTIVE 10: EQUALITY

Policies for mitigation of potential adverse effects associated with equality

- Policy **PSD1: Overall Development Strategy** sets out the Council's overall approach to the development strategy for the Plan period to 2040 including the delivery of a minimum of 83ha of new employment land and 8,000 dwellings to meet the identified housing and employment needs.
- Policies **PSD2: Settlement Hierarchy** and **PSD3: Distribution of Development** will ensure that new housing development is delivered in accordance with the provision of and accessibility to key services, including jobs, schools and local shops.
- Policy **PSD6: Health and Wellbeing** promotes accessible services and active travel connections, supporting health and active lifestyles and seeking to address health inequalities in the borough.
- Policy **PSD7: Design** seeks to ensure that developments are accessible and inclusive for all, including for people with disabilities or other specialist requirements, ensuring that developments are appropriate "*regardless of disability, age, gender, ethnicity or economic circumstances*". The policy further encourages developments to seek opportunities to integrate natural surveillance through design and layout and consider appropriate lighting, which will be likely to help reduce crime and the fear of crime.
- Policy **HOU1: Affordable Housing** will help to ensure that the Local Plan delivers an appropriate distribution of affordable housing that meets the varied needs of current and future residents of the borough
- Policies **HOU2: Housing Mix and Density** aims to ensure that the Local Plan delivers an appropriate density and mix of housing to meet the varied needs of current and future residents, whilst responding to the local characteristics and sensitivities.
- Various Local Plan policies, including **Policies HOU3: Housing Standards, HOU4: Gypsy, Travellers and Travelling Showpeople, HOU5: Specialist Needs Housing, HOU6: Self Build and Custom Dwellings, HOU7: Homes in Multiple Occupation** and **SA1: General Requirements** will ensure that the varied needs of Newcastle-under-Lyme's different communities are met in a sustainable manner.
- Policy **IN1: Infrastructure** will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, including affordable homes, transport, and social infrastructure.
- Policy **IN2: Transport and Accessibility** seeks to promote sustainable transport and promote improved connectivity to local services through a range of criteria for new development proposals.
- Policy **IN5: Provision of Community Facilities** will help to safeguard and improve services for use by local communities, in line with evidenced needs.
- Policy **SE14: Green and Blue Infrastructure** includes provisions to improve access to GI/BI assets, particularly within areas of lower environmental quality or health inequalities.

Commentary: Will the policies mitigate the identified adverse effects?

- **Growth in deprived areas: YES ✓** The Local Plan policies set out the provision of new and improved social infrastructure, high quality homes, job opportunities, and transport improvements to address the needs of the population and tackle inequalities.
- **Loss of housing: YES ✓** The Local Plan policies will ensure that the identified housing and employment needs are met over the Plan period from 2020 to 2040, and that a suitable mix of housing types and densities are provided to meet the varied needs of the local communities.

Table H.3.11: Likely adverse effects and policies for potential for mitigation on SA11: Transport and Accessibility

SA OBJECTIVE 11: TRANSPORT AND ACCESSIBILITY

Identified adverse effects on transport & accessibility

- **Limited access to bus services:** A small number of reasonable alternative sites were identified to be located beyond the sustainable distance of 800m to a bus stop, potentially limiting access to sustainable transport options for site end users.
- **Limited access to rail services:** The majority of reasonable alternative sites were assessed as having poor access to the railway network in Newcastle-under-Lyme, located over 1.2km away from the nearest railway station.
- **Limited pedestrian / cycle access:** Accessibility to local cycle and pedestrian networks is limited in some locations, whereby the majority of reasonable alternative sites were assessed as having poor access to the surrounding cycle network and a smaller proportion of sites have poor access to the existing footpath network.
- **Limited access to schools:** Sustainable access to schools varies across the borough, with the majority of sites located at a distance greater than 1.2km from the nearest secondary school, and a smaller proportion of sites beyond 800m from the nearest primary school. This is likely to lead to greater reliance on less sustainable modes of transport to reach local schools.
- **Limited access to employment:** In some areas of the borough, sustainable access to key employment areas and the range of employment opportunities they provide may be more limited, owing to a number of sites being located beyond 1.2km from the nearest key employment location.
- **Limited access to local services:** Sustainable access to local services, including convenience stores, community centres and post offices, is limited in some areas, with a number of reasonable alternative sites located beyond the sustainable distance of 800m to local services.

Policies for mitigation of potential adverse effects associated with transport & accessibility

- Policy **IN2: Transport and Accessibility** promotes sustainable transport and promote improved connectivity to local services, including schools and jobs, and supports improved links to Kidsgrove Railway Station and introduces measures ensuring development proposals that generate significant amount of travel movements be informed by a Travel Plan.
- Policy **IN1: Infrastructure** will ensure development proposals will provide or contribute towards the provision of a range of infrastructure, which includes sustainable transport and social infrastructure. The policy supports the expansion of Madeley High School to cater for future demand on school places.
- Policy **IN3: Access and Parking** supports the provision of electric vehicle charging points and careful design of car parking, ensuring pedestrian access is not undermined and that parking levels are reduced in appropriate areas to encourage the uptake of public transport modes.
- Policy **IN6: Telecommunications Development** supports and encourages the expansion of telecommunications and high-speed broadband, with likely benefits for local businesses and opportunities for home or hybrid working.
- Policies **PSD2: Settlement Hierarchy** and **PSD3: Distribution of Development** set out the hierarchy of settlements within the borough and direct development in accordance with infrastructure service provision, namely by prioritising development in and around the town centres where sustainable transport and active travel options are most prevalent.
- Policies **PSD6: Health and Wellbeing** and **IN4: Cycleways, Bridleways and Public Rights of Way** aim to ensure that development proposals provide good access, including via active travel, which may help to encourage active lifestyles and increase the uptake of cycling and walking, through the provision of safe and accessible routes.
- Policy **SE14: Green and Blue Infrastructure** encourages opportunities to be sought to link green and blue infrastructure improvements into wider public realm and connectivity initiatives, providing attractive active travel routes.

SA OBJECTIVE 11: TRANSPORT AND ACCESSIBILITY

- Under **PSD7: Design** development is guided to improve accessibility and connectivity to align with the Building for a Healthy Life (BHL) design toolkit, which includes walking, cycling and public transport.
- Policy **CRE1: Climate Change** encourages development to be designed to promote walking, cycling, and sustainable modes of transport.
- Policy **EMP1: Employment** will ensure that employment sites provide "*high quality sustainable transport connections*".
- Policy **RE1: Retail** will ensure that development proposals for retail and leisure be promoted in appropriate areas, within the defined centres, thereby improving accessibility to the developments and encouraging sustainable modes of travel.
- Policies **RET4: Newcastle-under-Lyme Town Centre** and **RET5: Kidsgrove Town Centre** support enhancements to permeability of the public realm for pedestrians and cyclists, and encourage improved public transport options and connectivity. A new "*shared services hub*" is proposed in Kidsgrove, and opportunities for diversified town centre uses are supported in Newcastle-under-Lyme.
- Policy **SA1: General Requirements** will ensure that new developments are informed by transport assessments and travel plans, in accordance with other Local Plan policies, and cross-references to the necessary strategic transport mitigation measures to reduce or alleviate cumulative adverse effects on the wider transport network.

Commentary: Will the policies mitigate the identified adverse effects?

- **Limited access to bus/rail services: NO X** The Local Plan policies are expected to improve the access to sustainable transport options, particularly within and surrounding the main towns of Newcastle-under-Lyme and Kidsgrove; however, it is unlikely that the Local Plan policies would fully mitigate the restricted access to public transport infrastructure in more rural and isolated locations across the Plan area.
- **Limited pedestrian/cycle access: YES ✓** The Local Plan policies are expected to mitigate adverse impacts associated with restricted access to the pedestrian and cycle networks and help to encourage the uptake of these sustainable transport options in order to access community facilities.
- **Limited access to local services, schools and employment: NO X** The Local Plan policies include measures to maintain existing local services and facilities as far as possible, safeguard land for school expansions, and ensure employment sites are accessible via public transport. The improvements to sustainable transport provision and connectivity will be likely to improve accessibility to local services, jobs and schools in general. However, these policies are not expected to fully mitigate the restricted access to local facilities, schools and employment opportunities in more rural locations of the Plan area.

Table H.3.12: Likely adverse effects and policies for potential for mitigation on SA12: Economy

SA OBJECTIVE 12: ECONOMY

Identified adverse effects on the economy

- **Loss of employment floorspace:** Where reasonable alternative sites coincide with existing employment areas, there is potential for a net decrease in employment floorspace across the Plan area, leading to adverse effects on the local economy.

Policies for mitigation of potential adverse effects associated with the economy

- Policy **PSD1: Overall Development Strategy** sets out the Council's overall approach to the development strategy for the Plan period to 2040 including the delivery of a minimum of 83ha of new employment land, in combination with supporting the existing supply of approximately 43ha of employment land. This policy will ensure the identified employment needs are met.
- Policy **EMP1: Employment** seeks to meet the identified employment land needs within Newcastle-under-Lyme over the Local Plan period, through supporting proposals for the

SA OBJECTIVE 12: ECONOMY

expansion, intensification or redevelopment of employment sites where this would not compromise other objectives of the Local Plan.

- Policy **EMP2: Existing Employment Sites** will ensure that any proposals for alternative uses on existing employment land are only supported where the land is no longer suitable or required for employment uses, and the alternative use is appropriate for its surroundings.

Commentary: Will the policies mitigate the identified adverse effects?

- **Loss of employment floorspace: YES ✓** The Local Plan policies are expected to mitigate the potential adverse impacts associated with the loss of existing employment uses associated with the reasonable alternative sites, and ensure enough employment land is delivered to meet the identified needs for the Plan period.

H.4 Post mitigation site assessments

H.4.1 Overview

H.4.1.1 The impact matrix for all reasonable alternative site assessments post-mitigation is presented in **Table H.4.1**. These impacts have been identified following consideration of the likely mitigation effects of the Local Plan policies as discussed in **Tables H.3.1 to H.3.12**.

Table H.4.1: Impact matrix of all reasonable alternative site assessments post-mitigation

Site ref	SA stage	SA1 Climate Change	SA2 Air	SA3 Biodiversity, Flora & Fauna	SA4 Natural Resources & Waste	SA5 Flooding	SA6 Water	SA7 Cultural Heritage	SA8 Landscape	SA9 Health & Wellbeing	SA10 Equality	SA11 Transport & Accessibility	SA12 Economy
AB2	R18	+	-	-	--	0	0	0	--	-	0	-	++
AB2	R19	+	-	-	--	0	0	0	--	-	++	-	++
AB4	R18	+	-	+/-	-	+	0	0	--	-	++	-	+
AB12	R18	0	0	+/-	-	+	0	0	--	-	++	-	0
AB15	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
AB16	R18	0	0	-	--	+	0	0	--	-	++	-	0
AB22	R18	+	0	+/-	-	+	0	0	--	-	++	-	0
AB24	R19	+	0	-	-	+	0	0	--	-	+	-	0
AB27	R18	+	0	-	-	+	0	0	--	-	+	-	0
AB30	R18	+	0	+/-	-	+	0	0	--	-	++	-	+
AB32	R18	+	0	-	-	+	0	0	--	-	+	-	0
AB33	R18	0	0	+/-	-	+	0	0	--	-	+	-	0
AB34	R18	0	0	-	-	+	0	0	--	-	++	-	0
AB37	R18	0	0	--	-	0	0	0	--	-	++	-	0
AB72	R18	+	0	-	-	+	0	0	--	-	+	-	0
AB73	R18	+	0	-	+	+	0	0	--	-	+	-	0
AB75	R18	+	0	+/-	-	+	0	0	--	-	++	-	+
AB77	R18	+	0	-	--	0	0	0	--	-	++	-	++
AB78	R18	+	-	+/-	-	+	0	0	--	-	+	-	0
AB79	R18	+	0	+/-	-	+	0	0	--	-	++	-	0
HD26	R18	+	0	+/-	+	+	0	0	--	-	+	-	0
HM8	R18	+/-	-	-	-	+	0	0	--	-	++	-	0
HM10	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0
HM15	R18	+	0	--	++	+	0	0	-	-	+	-	0
HM20	R19	+	0	+/-	++	+	0	0	--	-	+	-	0
HM22	R18	+	0	-	++	+	0	0	-	-	+	-	0
HM23	R19	+	0	+/-	++	+	0	0	--	-	+	-	0
HM62	R19	+/-	0	+/-	++	+	0	0	--	-	+	-	0
HM63	R19	+	0	+/-	++	+	0	0	--	-	+	-	0
HM66	R18	+	0	-	-	+	0	0	--	-	+	-	0
CL6	R18	+/-	0	+/-	++	+	0	0	+	-	+	-	0
CL8	R18	+	-	-	-	+	0	0	--	-	+	-	0
SB12	R18	+/-	-	-	++	+	0	0	+	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CT1	R18	+	-	+/-	++	+	0	0	-	-	++	-	0
CT1	R19	+	-	+/-	++	+	0	0	-	-	++	-	0
CT10	R18	+/-	0	--	++	+	0	0	+	-	++	-	+
CT20	R18	+/-	0	--	++	+	0	0	-	-	0	-	+
CT21	R19	+/-	0	-	+	+	0	0	+	-	+	-	0
CT25	R18	+	0	-	+	+	0	0	--	-	++	-	0
HD10	R19	+	0	--	++	0	0	0	-	-	0	-	+
CH3	R18	0	0	+/-	++	+	0	0	-	-	++	-	0
CH13	R18	+/-	0	+/-	+	0	0	0	+	-	0	-	0
CH14	R18	0	0	+/-	+	+	0	0	+	-	+	-	0
KS3	R18	0	0	+/-	+	+	0	0	+	-	++	-	0
KS11	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
KS17	R18	0	0	+/-	+	+	0	0	+	-	+	-	0
KS18	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
KS19	R18	+/-	0	+/-	+	+	0	0	+	-	+	-	0
WS9	R19	0	-	-	++	+	0	0	+	-	+	-	0
KL9	R18	+	-	-	++	+	0	0	--	-	++	-	0
KL12	R18	+/-	-	--	-	+	0	0	--	-	+	-	0
KL13	R18	+	-	--	--	+	0	0	--	-	++	-	0
KL14	R18	+	0	-	--	+	0	0	--	-	+	-	0
KL15	R18	+	-	+/-	-	+	0	0	--	-	++	-	++
KL20	R18	+	-	-	++	+	0	0	--	-	+	-	0
KL21	R18	+	-	+/-	--	+	0	0	--	-	++	-	++
KL22	R19	+	-	-	-	+	0	0	--	-	+	-	0
KL33	R18	+	0	+/-	++	+	0	0	--	-	+	-	0
KL34	R18	+	0	-	-	+	0	0	--	-	++	-	0
BL31	R19	+	-	-	-	+	0	0	0	-	+	-	0
KG6	R18	+/-	-	+/-	+	+	0	0	+	-	+	++	0
KG26	R18	+/-	0	+/-	+	+	0	0	+	-	+	++	0
RC4	R18	+/-	-	+/-	++	+	0	0	+	-	+	++	0
RC8	R18	+/-	-	--	+	+	0	0	+	-	+	++	0
RC11	R19	+	-	-	+	+	0	0	--	-	++	-	0
LW14	R18	+/-	0	-	+	+	0	0	--	-	+	-	0
LW23	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0
LW27	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
LW29	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW30	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW41	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW49	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0
LW53	R18	+/-	0	+/-	-	+	0	0	--	-	++	-	0
LW54	R18	+/-	-	-	+	+	0	0	--	-	++	-	0
LW81	R18	+/-	0	-	-	+	0	0	--	-	+	-	0
LW82	R18	+/-	0	+/-	+	+	0	0	--	-	+	-	0
LW87	R18	+/-	-	+/-	+	+	0	0	--	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
HM4	R18	+/-	-	-	-	+	0	0	--	-	+	-	0
HM7	R19	+/-	-	-	-	+	0	0	--	-	+	-	0
HM28	R18	+/-	-	+/-	+	+	0	0	--	-	+	-	0
HM29	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
MD2	R18	+	-	+/-	-	+	0	0	-	-	+	-	0
MD5	R18	+/-	-	+/-	-	+	0	0	-	-	+	-	0
MD11	R18	+	0	+/-	-	+	0	0	-	-	+	-	0
MD12	R18	+	-	-	-	0	0	0	-	-	++	-	++
MD13	R18	+	0	-	-	+	0	0	--	-	++	-	0
MD18	R18	+	0	-	-	+	0	0	--	-	+	-	0
MD19	R18	+	0	-	-	+	0	0	--	-	+	-	0
MD20	R18	+	-	-	--	0	0	0	-	-	++	-	0
MD25	R18	+/-	-	-	-	+	0	0	-	-	+	-	0
MD29	R18	+/-	-	+/-	-	+	0	0	-	-	+	-	0
MD29	R19	+/-	-	+/-	-	+	0	0	-	-	++	-	0
MD30	R18	+/-	-	+/-	-	+	0	0	-	-	+	-	0
MD32	R18	+/-	0	-	-	+	0	0	-	-	+	-	0
MD33	R18	+/-	-	+/-	-	+	0	0	-	-	++	-	0
MD34	R18	+	0	+/-	-	+	0	0	-	-	+	-	0
MD39	R18	+/-	-	-	-	+	0	0	-	-	+	-	0
MD40	R18	+/-	0	-	-	+	0	0	-	-	++	-	0
MD56	R18	+	-	--	++	+	0	0	-	-	+	-	0
LW6	R18	+/-	-	-	-	+	0	0	--	-	++	-	+
LW7	R18	+	-	-	-	+	0	0	--	-	+	-	0
LW9	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW24	R19	+/-	0	-	+	+	0	0	--	-	+	-	0
LW38	R18	+/-	-	-	-	+	0	0	--	-	+	-	0
LW42	R18	+/-	0	+/-	-	+	0	0	--	-	+	-	0
LW48	R18	+/-	-	--	-	+	0	0	--	-	++	-	0
LW74	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW78	R18	+/-	-	-	-	+	0	0	--	-	+	-	0
LW83	R18	+/-	0	+/-	-	+	0	0	-	-	+	-	0
LW84	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW86	R18	+/-	-	+/-	-	+	0	0	--	-	+	-	0
LW91	R19	+/-	0	+/-	-	+	0	0	--	-	++	-	0
NC5	R19	+	0	+/-	++	+	0	0	-	-	++	-	0
NC13	R18	+	0	-	++	+	0	0	-	-	+	-	0
NC77	R18	+	-	-	++	+	0	0	-	-	+	-	+
NC78	R18	+	-	-	++	+	0	0	--	-	++	-	0
NC80	R18	+	0	-	++	+	0	0	--	-	++	-	0
NC81	R18	+	0	-	++	+	0	0	--	-	+	-	0
NC83	R18	+	0	-	++	+	0	0	-	-	+	-	0
SP2	R18	+/-	0	+/-	++	+	0	0	+	-	++	-	0
SP11	R18	+	-	--	++	+	0	0	--	-	+	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SP11(1)	R19	+	-	-	-	+	0	0	--	-	++	-	0
SP11(2)	R19	+	-	--	-	+	0	0	--	-	++	-	0
SP11(3)	R19	+	0	+/-	-	+	0	0	--	-	++	-	0
SP11(4)	R19	+	0	-	-	+	0	0	--	-	++	-	0
SP12	R18	+	0	-	++	+	0	0	--	-	++	-	0
SP14	R18	+	-	--	++	+	0	0	--	-	+	-	0
SP22	R18	+/-	0	+/-	++	+	0	0	+	-	++	-	0
SP23	R18	+	-	-	++	+	0	0	--	-	0	-	0
SP23	R19	+	-	--	-	+	0	0	--	-	++	-	0
BW1	R19	+	-	-	++	+	0	0	-	-	++	-	+
BL3	R18	+/-	-	--	+	+	0	0	+	-	++	++	0
BL4	R19	+/-	-	--	+	+	0	0	+	-	+	++	0
BL8	R18	+/-	0	+/-	+	+	0	0	+	-	++	-	+
BL18	R18	0	-	-	+	+	0	0	-	-	+	++	0
BL18	R19	0	-	-	+	+	0	0	-	-	0	++	0
BL24	R18	+/-	-	+/-	+	+	0	0	+	-	+	++	0
BL32	R18	+/-	-	-	+	+	0	0	+	-	+	++	+
TK6	R18	0	0	+/-	+	+	0	0	-	-	++	-	0
TK10	R18	+	0	-	-	+	0	0	--	-	+	-	0
TK17	R18	+	-	-	++	+	0	0	-	-	++	-	0
TK18	R18	+	-	--	+	+	0	0	--	-	+	-	++
TK24	R18	+	0	-	-	+	0	0	-	-	++	-	0
TK25	R18	+	0	+/-	-	+	0	0	--	-	+	-	++
TK27	R18	+	0	-	-	+	0	0	-	-	+	-	0
TK29	R19	+	-	-	++	+	0	0	-	-	++	-	0
TK30	R18	+	-	--	++	+	0	0	-	-	0	-	++
TK45	R18	+	-	-	++	+	0	0	--	-	++	-	+
TK46	R18	+	-	--	+	+	0	0	--	-	0	-	0
TK47	R18	+	-	--	--	+	0	0	--	-	+	-	++
TB6	R18	+/-	-	+/-	-	+	0	0	+	-	++	-	0
TB19	R18	+	-	-	--	+	0	0	--	-	++	-	++
TB23	R18	+/-	-	-	-	0	0	0	+	-	+	-	0
TB24	R18	+/-	-	--	++	+	0	0	--	-	+	-	0
MB12	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	0
MB13	R18	+/-	-	+/-	+	+	0	0	+	++	+	-	0
MB15	R18	+/-	-	+/-	+	+	0	0	+	++	+	-	0
TC7	R18	0	-	+/-	++	+	0	0	+	++	+	-	+
TC19	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC20	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC22	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	+
TC40	R18	+/-	-	+/-	++	+	0	0	+	++	0	-	0
TC45	R18	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC50	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
TC52	R19	+/-	-	+/-	++	+	0	0	+	++	++	-	0

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site ref	SA stage	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC71	R19	+/-	-	+/-	++	+	0	0	+	++	+	-	0
Site 1	R18	+/-	-	--	+	+	0	0	-	-	+	-	0
Site 2	R18	+/-	0	--	+	+	0	0	-	-	+	-	0
Site 3	R18	+	0	-	+	+	0	0	--	-	+	-	0
Site 4	R18	+/-	0	--	++	+	0	0	0	-	+	++	0
Site 5	R18	+	-	-	-	+	0	0	--	-	+	-	0
Site 6	R18	+/-	-	--	-	+	0	0	+	-	+	++	0
Site 7	R18	+/-	-	+/-	++	+	0	0	-	-	+	-	0
Site 8	R19	+/-	0	+/-	-	+	0	0	+	-	+	-	0
Site 9	R19	+/-	0	--	+	0	0	0	+	++	+	-	0
Site 10	R19	+/-	0	-	-	0	0	0	+	-	+	-	0
Site 11	R19	+/-	-	+/-	+	0	0	0	+	-	++	++	0

Appendix I: Reasons for Selection and Rejection of Reasonable Alternative Sites

Table I.1.1: NuLBC's outline reasons for selecting and rejecting reasonable alternative sites.....	I1
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I.1 Selected and rejected sites.....	I1
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I.1 Selected and rejected sites

I.1.1.1 **Table I.1.1** lists all reasonable alternative sites that have been evaluated throughout the SA process, and indicates which have been:

1. **Selected** – i.e. the reasonable alternative sites that have been chosen as preferred sites for allocation and are set out in the 'Final Draft' Regulation 19 version of the Newcastle-under-Lyme Local Plan (2024); or
2. **Rejected** – i.e. the reasonable alternative sites that have been considered as part of the SA process but are not preferred sites for allocation in the Local Plan.

I.1.1.2 The outline reasons for selecting or rejecting each of the reasonable alternative sites, as set out in the table below, have been provided by NuLBC and are reflective of the Council's consideration of the iterative SA findings as well as other evidence base information.

I.1.1.3 It should be noted that one housing site which has been assessed as a reasonable alternative in the SA process has since been granted planning permission: Site CT21. As such, this site is no longer proposed to be allocated through the Local Plan and is no longer reasonable alternative site. Site CT21 therefore does not feature in the below table.

Table I.1.1: NuLBC's outline reasons for selecting and rejecting reasonable alternative sites

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected/ rejected?	Outline reason for selection / rejection provided by NuLBC
AB2	R18	69.91	Audley	Land adjoining corner of A500 and M6 southbound	Employment	Rejected	This assessment has been updated at Regulation 19 stage following additional information submitted by the site promotor at the Regulation 18 stage.
AB2	R19	78.37	Audley	Land adjoining corner of A500 and M6 southbound	Employment	Selected	The site is a preferred site in the Local Plan. The site is a strategic employment site with locational advantages for logistics use to meet local / regional employment land requirements. The site will also include a lorry park for Heavy Good Vehicles.
AB4	R18	5.06	Audley	Land off Alsager Road, North of Audley	Mixed use	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. The site is isolated and disconnected from Audley and Bignall End. The site has poor access to a range of services and facilities and is in close proximity to the A500, with associated amenity impacts

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
AB12	R18	6.35	Audley	Land East of Diglake Street, Bignall End	Housing	Selected	The site is a preferred site in the Local Plan as it has the potential to contribute towards development requirements in the borough and 'round off' the Green Belt boundary to the north if Audley subject to an appropriate landscape buffer being provided to the north of the site with the Green Belt.
AB15	R18	1.55	Audley	Land North of Vernon Avenue, Audley	Housing	Selected	The site is a preferred site in the Local Plan as it has the potential to contribute towards the development requirements in Audley and 'round off' the Green Belt boundary subject to an appropriate landscape buffer being provided between the site and the open countryside / Green Belt.
AB16	R18	28.44	Audley	Land off Boyles Hall Road, Bignall End	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is a Green Belt site and makes a strong contribution to Green Belt purposes. The site is of scale and there are concerns over access arrangements alongside impacts on the loss of agricultural land and highways access into the site. Loss of formal open space identified in the Open Space Strategy.
AB22	R18	15.19	Audley	Wall Farm, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts and would result in the loss of agricultural land.
AB24	R19	0.42	Audley	Land at Barthomley Road, Audley	Housing	Rejected	The site is not currently preferred as it is a site in the Green Belt located outside of the development boundary of Audley. The site is in close proximity to a biodiversity alert site and has limited access to services and facilities.
AB27	R18	0.29	Audley	Land South of Apedale Road, Wood Lane	Housing	Rejected	The site is not currently preferred as it is adjacent to a settlement in the other settlement and rural area tier of the settlement hierarchy. The site has limited access to a range of services and facilities and there is uncertainty regarding the agricultural tenancy status on the site. The site has poor access to services and facilities, mature trees on site.
AB30	R18	17.96	Audley	Land between Bignall End and Boon Hill, Audley	Mixed use (housing, education and sports)	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. The site makes a strong contribution to maintaining the gap between Bignall End and Wood Lane. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
AB32	R18	0.98	Audley	Land Nursery Gardens, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. The site is grade 3 agricultural land is part covered by Mineral Safeguarded Area. There is uncertainty about the access arrangements into the site.
AB33	R18	2.74	Audley	Land off Nantwich Road / Park Lane (1) Audley	Housing	Selected	The site is a preferred site in the Local Plan as it has the potential to contribute towards development requirements subject to an appropriate landscape buffer being provided between the site and the open countryside and Green Belt.
AB34	R18	11.13	Audley	Land off Nantwich Road / Park Lane (2) Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts, and would result in the loss of agricultural land and may have an impact on Kent Hill Quarry. Poor access to services and facilities. Poor access to services and facilities.
AB37	R18	13.04	Audley	Land East of Alsager Road (1), Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. The site also has ecological and flooding concerns that would require mitigation. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts.
AB72	R18	4.12	Audley	Land East of Wereton Road, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. The site is detached from Audley and Bignall End. The site is grade 3 & 4 agricultural land. There are also concerns over access to the site, particularly as there are no public footpaths on the site side.
AB73	R18	0.50	Audley	Land West of Wereton Road, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. The site is disconnected from Audley. There are also access concerns (highways and sustainable transport) into the site.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
AB75	R18	5.66	Audley	Land west of Bignall End Road	Mixed use	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. There are concerns over access into the site and surface water flooding impacts that would have to be mitigated. A Biodiversity Alert Site adjoins the north-eastern boundary. Constrained access, no footpaths or street lighting.
AB77	R18	27.03	Audley	Corner House Farm, Alsager Road, Audley	Mixed use	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. There are also concerns over surface water flooding impacts and the impact of the adjacent Waste Water Treatment Works. The site is extensive in scale and largely disconnected from Audley. Poor access to services and facilities.
AB78	R18	3.52	Audley	Land North of Cross Lane, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. The site is isolated and disconnected from Audley and Bignall End and there are concerns regarding access into the site. Poor access to services and facilities.
AB79	R18	18.66	Audley	Land South of Cross Lane, Audley	Housing	Rejected	The site makes a moderate contribution to Green Belt purposes. The site is isolated and disconnected from Audley and Bignall End and there are concerns regarding access into the site. Poor access to services and facilities.
HD26	R18	1.79	Audley	Land South of Shraleybrook Road, Halmerend	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is a Green Belt site albeit it makes a weak contribution to Green Belt purposes. The site is detached from Audley and Bignall End and borders the Halmer End settlement. The site adjoins a site of biological importance and there are contamination and access concerns into the site. The site does not front High Street/Shraleybrook Road, therefore third party land may be required.
HM8	R18	5.25	Audley	Land West of Heathcote Road, Miles Green	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is a Green Belt site and makes a strong contribution to Green Belt purposes. The site makes an important contribution to the separation of Halmer End and Miles Green.
HM10	R18	2.15	Audley	Land off Victoria Avenue, Miles Green	Housing	Rejected	The site is currently non preferred. The site makes a strong contribution to Green Belt purposes. Due to its shape and orientation the site protrudes into the open countryside.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
HM15	R18	0.26	Audley	Land south of Leycett Road, Scot Hay	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is a Green Belt site and makes a moderate contribution to Green Belt purposes. The site is detached from Audley and Bignall End and is in the Scot Hay settlement. The site has poor access to services and facilities.
HM20	R19	3.65	Audley	Land off Crackley Lane, Audley	Housing	Rejected	The site is not currently preferred as it's a greenfield site. The site makes a strong contribution to Green Belt purposes. The site is detached from rural centres in the Plan. There are biodiversity alert site within 400m. Limited access to services and facilities. The site falls partially in the open space strategy.
HM22	R18	1.66	Audley	Land adj Holly House, Crackley Lane, Scot Hay	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. The site is isolated and disconnected from Audley and Bignall End and there are concerns regarding the locational accessibility of the site. Poor access to services and facilities.
HM23	R19	2.06	Audley	Land off Leycett Road, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. The site is isolated and disconnected from settlements. The site is located close to Biodiversity Alert sites. The site has limited access to services and facilities.
HM62	R19	1.03	Audley	Land south of Blackbank Road, Alsagers Bank	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a strong contribution to Green Belt purposes. Ancient woodland is within 800m of the site. The site is isolated and disconnected from settlements. The site is located close to Biodiversity Alert sites. The site has limited access to services and facilities.
HM63	R19	0.53	Audley	Land off Scot Hay Road, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. The site has a constrained access and a bend along Scot Hay Road. The site is irregular in shape.
HM66	R18	2.25	Audley	Land South of Hougher Wall Road, Audley	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is a Green Belt site and makes a strong contribution to Green Belt purposes. The site would result in the loss of agricultural land and there is potential surface water flood risk that would need to be mitigated. Further information is required regarding access arrangements into the site.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
CL6	R18	0.48	Clayton, Westbury Park & Northwood	Stafford Crescent (garage site)	Housing	Rejected	The site is not currently preferred as it is irregular in shape, has a number of mature trees and access to the site is constrained.
CL8	R18	2.06	Clayton, Westbury Park & Northwood	Land East of Cambridge Drive (2), Clayton	Housing	Rejected	The site is currently non preferred. The site is a greenbelt site which makes a strong contribution to Green Belt purposes. Access into the site is constrained. Ancient woodland and the Clayton Conservation Area adjoin part of the western boundary.
SB12	R18	1.79	Clayton, Westbury Park & Northwood	Land adjacent to Clayton Lodge Hotel	Housing	Selected	The site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of the Borough. The site, as at June 2024 is under construction and is therefore a commitment post 31 March 2023.
CT1	R18	32.04	Crackley Bank, Red Street, Holditch & Chesterton	Land at Red Street and High Carr Farm, Chesterton	Housing	Rejected	This assessment has been updated at Regulation 19 stage following additional information and confirmation of site boundaries by the site promotor.
CT1	R19	19.42	Crackley Bank, Red Street, Holditch & Chesterton	Land at Red Street and High Carr Farm, Chesterton	Housing	Selected	The site is a preferred site in the Local Plan as it has the potential to contribute towards development requirements in the borough subject to an appropriate buffer being provided between the site and the Green Belt.
CT10	R18	4.16	Crackley Bank, Red Street, Holditch & Chesterton	Parkhouse Road West, Chesterton	Employment or Housing	Rejected	The site is currently non preferred due to impacts on amenity greenspace and the economic needs assessment grading the site as poor for employment development. The site has a number of mature trees on the site and some areas of the site are affected by surface water flooding.
CT20	R18	8.88	Crackley Bank, Red Street, Holditch & Chesterton	Rowhurst Close, Chesterton	Employment	Selected	The site is a preferred site in the Local Plan for employment uses as the economic needs assessment suggests that the site is suitable for employment uses.
CT25	R18	8.27	Crackley Bank, Red Street, Holditch & Chesterton	Land off Audley Rd, Chesterton	Housing	Rejected	The site is currently non preferred as the site is located away from existing settlement and in Green Belt therefore could contribute to urban sprawl, poor access to services and facilities. The site makes a strong contribution to Green Belt purposes.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
HD10	R19	13.12	Red Street, Holditch & Chesterton	Land South of Apedale Road, Holditch	Employment	Rejected	The site is currently non preferred. The site is a Green Belt site. The site is identified as high quality / high value Natural and Semi-Natural Greenspace in the Open Space Strategy 2022. The majority of the site is also a Biodiversity Alert Site (Apedale Disused Tip). Part of the site is affected by flood zones 2 and 3. Developable area calculation reduced to take into the heavily wooded and flood zone areas. Access via Apedale Road has no footpaths or street lighting. Development high risk areas on site.
CH3	R18	3.80	Cross Heath, Knutton and Wolstanton	Land at Hoon Avenue, Newcastle	Housing	Selected	The site is considered a preferred site in the Local Plan as it is a commitment. The site was granted outline planning permission on appeal on the 29 February 2024.
CH13	R18	0.59	Cross Heath, Knutton and Wolstanton	Castletown Grange, Douglas Road, Cross Heath	Housing	Selected	The site is considered a preferred site in the Local Plan as it will result in the appropriate redevelopment of the brownfield site.
CH14	R18	0.69	Cross Heath, Knutton and Wolstanton	Maryhill Day Centre, Wilmott Drive, Cross Heath	Housing	Selected	The site is considered a preferred site in the Local Plan as it is a brownfield site that will make a contribution towards development requirements in the borough.
KS3	R18	3.76	Cross Heath, Knutton and Wolstanton	Land at Blackbank Road, Knutton (adjacent Knutton Children's Centre)	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough.
KS11	R18	0.57	Cross Heath, Knutton and Wolstanton	Knutton Community Centre, High Street Knutton	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough.
KS17	R18	2.33	Cross Heath, Knutton and Wolstanton	Knutton Recreation Centre, Knutton Lane	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough.
KS18	R18	0.12	Cross Heath, Knutton and Wolstanton	Land North of Lower Milehouse Lane, Knutton	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough.
KS19	R18	0.08	Cross Heath, Knutton and Wolstanton	Knutton Lane	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough.
WS9	R19	1.45	Cross Heath, Knutton and Wolstanton	Land off Canary Grove / Lamp House Way, Wolstanton	Housing	Selected	The site is considered a preferred site in the Local Plan as it is a commitment. The site was granted planning permission on appeal on the 19 December 2023.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
KL9	R18	6.87	Keele	Land west of Quarry Bank Road, Keele	Housing	Rejected	The site is not currently preferred as it is a greenfield site and in the Green Belt. The site makes a weak contribution to Green Belt purposes and is detached from the urban area or settlement. There are also concerns over surface water flooding impacts, issues with topography and landscape impacts.
KL12	R18	1.32	Keele	Land north of Keele University, Keele	Housing	Rejected	This site is not currently preferred as it is heavily wooded. It is in close proximity to a conservation area and there are topographical issues as the land falls from A525 downwards to the north.
KL13	R18	26.13	Keele	Keele Science Park Phase 3, University of Keele	Mixed use	Selected	The site is a preferred site in the Local Plan for employment uses as part of a continuation of development of the Science Park.
KL14	R18	26.25	Keele	Land South-East of Keele University	Mixed use	Rejected	This site is not currently preferred as part of the site is a Designated Park and heavily wooded. It also has poor access to services and facilities.
KL15	R18	18.05	Keele	Land South of A525 between Keele University and Newcastle	Mixed use	Selected	The site is a preferred site in the Local Plan. The site will support the Keele Science Growth Corridor and a key economic driver for the borough.
KL20	R18	4.12	Keele	Land South of Pepper Street, Keele	Housing	Rejected	The site makes a moderate contribution to Green Belt purposes. Significantly steep incline from Pepper Street up the hill to the east of the site.
KL21	R18	23.86	Keele	Land South of A525 and either side of Quarry Bank Rd, Keele	Mixed use	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. Topography - land slopes upwards from Station Road and the A525. Impact on townscape of Keele Village conservation area & setting of Grade II* listed building (St John the Baptist Church). Surface water flood risk (1 in 30 years).
KL22	R19	0.41	Keele	Land off Chapel Close, Keele	Housing	Rejected	This site is located within Keele's Green Belt. A sculpture is located on site that is listed as a locally important structure. Holly Wood (biodiversity alert site) is within 400m. Redheath Plantation (also a biodiversity alert site) and Madeley Heath (site of biological importance) within 800m. The site has limited access to services and facilities.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
KL33	R18	3.38	Keele	Land West of Keele Road, Keele Road	Housing	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. Topography - the site undulates and land falls downwards from Keele Road. Impact on townscape of Keele Village conservation area & setting of Grade II* listed building (St John the Baptist Church).
KL34	R18	12.32	Keele	Land West of Three Mile Lane, Keele	Housing	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. Rural/Countryside character. Visually prominent & large scale development in locality would be incongruous. Surface water flood risk (1 in 30 years)
BL31	R19	1.15	Kidsgrove & Ravenscliffe	Woodlands Farm, Church Lawton	Housing	Rejected	The site is not currently a preferred site. The site is in the Green Belt and makes a strong contribution to Green Belt purposes. The site is in close proximity to a conservation area and listed building. The site is also close to the border with Cheshire East.
KG6	R18	0.18	Kidsgrove & Ravenscliffe	William Road, Kidsgrove (site of the Galley PH)	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough. The site is in the urban area within an existing residential setting.
KG26	R18	0.13	Kidsgrove & Ravenscliffe	Land at Bedford Road	Housing	Rejected	The site is not currently considered a preferred site due to impacts on amenity and harm to the character and appearance of the local area.
RC4	R18	0.65	Kidsgrove & Ravenscliffe	Kinnersley Street, Kidsgrove	Housing	Rejected	The site is not currently a preferred site in the Local Plan due to the impacts of mature trees and topography, reducing the developable area.
RC8	R18	0.38	Kidsgrove & Ravenscliffe	Land at Liverpool Road (part of Birchenwood) Kidsgrove (parcel 2)	Housing	Selected	The site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of the Borough. The site is a commitment and is currently under construction.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
RC11	R19	15.41	Kidsgrove & Ravenscliffe	Land at the end of Birchenwood Way, Kidsgrove	Housing	Rejected	The site is not currently a preferred site in the Local Plan. The site is a Green Belt site. It makes a weak contribution to Green Belt purposes. The site borders the administrative areas of Stoke-on-Trent and therefore may present cross boundary issues. A site of Biological Importance occupies the northern part of the site. The site is in a development high risk area. There are overhead power lines on the site and the site is partially covered by natural and semi-natural greenspace in the Open Space Strategy.
LW14	R18	0.44	Loggerheads	Land off Newcastle Road (Rowney Farm)	Housing	Rejected	This site is not currently preferred as it is harmful to local character/ appearance of area. It also has poor access to services and facilities.
LW23	R18	1.10	Loggerheads	Land at Pinewood Road, Loggerheads	Housing	Rejected	This site is not currently preferred as it is harmful to local character/ appearance of area.
LW27	R18	3.11	Loggerheads	Land at Church Road, Ashley (2)	Housing	Rejected	This site is not currently preferred as it has poor access to services and facilities. Access to site is also constrained.
LW29	R18	2.21	Loggerheads	Site 1 Charnes Road, Ashley	Housing	Rejected	The site is not currently a preferred site. Poor access to services and facilities. Access to site is constrained.
LW30	R18	0.59	Loggerheads	Land at Charnes Road, Ashley	Housing	Rejected	This site is not currently preferred as it has poor access to services and facilities. Access to site is also constrained.
LW41	R18	1.44	Loggerheads	Land South of Green Lane, Ashley	Housing	Rejected	This site is not currently preferred as it has poor access to services and facilities. Access to site is also constrained.
LW49	R18	0.28	Loggerheads	Land South of Wrekin House, Muckleston Wood Lane, Loggerheads	Housing	Rejected	This site is not currently preferred as it is harmful to local character/ appearance of area.
LW53	R18	8.35	Loggerheads	Land corner of Muckleston Wood Lane & Rock Lane, Loggerheads	Housing	Selected	The site is a preferred site in the Local Plan and makes a contribution to the development requirements of the borough.
LW54	R18	9.16	Loggerheads	Land South of Muckleston Road, Loggerheads	Housing	Rejected	This site is not currently preferred as it is harmful to local character/ appearance of area.
LW81	R18	2.29	Loggerheads	Gravel Bank, Muckleston Road, Loggerheads	Housing	Rejected	This site is not currently preferred as it is harmful to local character/ appearance of area.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
LW82	R18	0.98	Loggerheads	Sewage Works, Market Drayton Road, Loggerheads	Housing	Rejected	This site is not currently preferred as access to site is constrained - including Site of Biological Importance & surface water flood risk (1 in 30 years).
LW87	R18	0.19	Loggerheads	Former Petrol Station, Eccleshall Road, Loggerheads	Housing	Selected	This site is currently a preferred site as it makes a contribution to the development requirements of the borough and is a brownfield site. The site has been approved at planning committee on the Tuesday 18 July 2023.
HM4	R18	1.13	Madeley & Betley	Land corner of Main Road and Checkley Lane, Wrinehill	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is in the Green Belt and is disconnected from Betley and Madeley. The site has limited access to a range of services and facilities
HM7	R19	2.12	Madeley & Betley	Land off Crackow Moss Main Road, Betley	Housing	Rejected	The site is not currently a preferred site. The site is in the Green Belt and makes a strong contribution to Green Belt purposes. The site borders a site of biological importance. Betley Mere (RAMSAR and SSSI) are also within 400m of the site. The site has a steep topography and mature trees on site. Hedgerows, woodland and scrub/grassland exist on site. A number of listed buildings are within 400m. The entrance to the site is on a bend of the A531 which presents access constraints. Limited access to services and facilities
HM28	R18	0.23	Madeley & Betley	Land off East Lawns, Betley	Housing	Rejected	The site is not currently preferred site as it adjoins the Betley Conservation Area. The site is irregular in shape. There is also some uncertainty about the availability of the site as it's a garage site.
HM29	R18	0.32	Madeley & Betley	Lord Nelson Farm, Wrinehill	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site is in the Green Belt and is disconnected from Betley and Madeley. The site has limited access to a range of services and facilities
MD2	R18	1.36	Madeley & Betley	Land at Elmside Garden Centre, Main Road	Housing	Rejected	The site is not currently a preferred site. The site is detached & isolated from settlement. Poor access to services and facilities. In operational use as a garden centre.
MD5	R18	0.85	Madeley & Betley	The Old Wharf, Madeley Heath	Housing	Rejected	The site is not currently a preferred site. Part of the site is identified as high quality / high value Natural and Semi-Natural Greenspace in the Open Space Strategy 2022. Some mature trees on site. The site has limited access to a range of services and facilities. Mineral safeguarding area. Surface water flood risk (1 in 30 years).

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MD11	R18	2.94	Madeley & Betley	Land Area 6 at Marley Eternit Tiles, Madeley Heath	Mixed use	Rejected	The site is not currently a preferred site. A Site of Biological Importance adjoins part of the northern boundary. Constrained access via Honeywall Lane which is narrow and has no footpaths or street lighting. The site has poor access to a range of services and facilities. Surface water flood risk (1 in 30 years). Mineral safeguarding area.
MD12	R18	16.83	Madeley & Betley	Land Area 2 at Marley Eternit Tiles, Madeley Heath	Mixed use	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. The M6 motorway runs adjacent to the western boundary which would raise amenity concerns. An area within the north western boundary is affected by flood zones 2 and 3, and consists of a Biodiversity Alert Site. Some mature trees also on site (TPO). Coal Authority Development high risk area and public right of way on site. Surface water flood risk (1 in 30 years). Mineral safeguarding area.
MD13	R18	10.32	Madeley & Betley	Land at Windy Arbour Farm, Madeley	Housing	Rejected	The site is not currently a preferred site. The site makes a strong contribution to Green Belt purposes. Constrained access via New Road / Bowsey Wood Road. However, sections of the road do not have footpaths or street lighting. Tree Preservation Order and overhead power line on site. Surface water flood risk (1 in 30 years).
MD18	R18	4.32	Madeley & Betley	Land West of Furnace Lane, Madeley	Housing	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. Constrained access via Furnace Lane which is a single lane road with no footpaths or street lighting. Furthermore, Furnace Lane is extremely narrow just before the Newcastle Road junction. Some mature trees on site. A sewage works adjoins part of the southern boundary which could raise potential amenity and environmental health concerns. Surface water flood risk (1 in 30 years). Mineral safeguarding area.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
MD19	R18	1.55	Madeley & Betley	Land East of Furnace Lane, Madeley	Housing	Rejected	The site is not currently a preferred site. The site makes a strong contribution to Green Belt purposes. Highway access is constrained as it appears suitable access arrangements may involve a connection from Arbour Close onto an open space site (identified in the Open Space Strategy 2022). Access via Furnace Lane is a single lane road with no footpaths or street lighting. Furthermore, Furnace Lane is extremely narrow at the Newcastle Road junction. A sewage works is in close proximity to the site which could raise potential amenity and environmental health concerns. TPO. Mineral safeguarding area.
MD20	R18	39.13	Madeley & Betley	Brook House Farm, Madeley	Mixed use (housing, education and sports)	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. Flood zones 2 & 3. No clear defensible boundaries to assist with partitioning the site from further encroachment. Abuts M6 motorway.
MD25	R18	0.74	Madeley & Betley	Land South of Bar Hill, Madeley	Housing	Rejected	The site is not currently a preferred site. The site has an irregular shape. Surface water flood risk (1 in 30 years). Mineral safeguarding area.
MD29	R18	15.70	Madeley & Betley	Land North of Bar Hill, Madeley	Housing	Rejected	This assessment has been updated at Regulation 19 stage following consultation responses received at Regulation 18 stage.
MD29	R19	15.70	Madeley & Betley	Land North of Bar Hill, Madeley	Housing	Selected	The site is a preferred site in the Local Plan as it has the potential to contribute towards development requirements in the borough. The capacity of the site has been reduced to around 150 dwellings.
MD30	R18	0.74	Madeley & Betley	Land West of Bar Hill, Madeley	Housing	Rejected	The site is not currently a preferred site. Mineral safeguarding area. Falls within 200m HS2 buffer. It is a greenfield site.
MD32	R18	1.64	Madeley & Betley	Land Adjacent to Rowley House, Moss Lane	Housing	Rejected	The site is not currently a preferred site. Surface water flood risk (1 in 30 years). Mineral safeguarding area. Proximity to West Coast mainline.
MD33	R18	1.87	Madeley & Betley	Land West of Manor Road, Madeley	Housing	Rejected	The site is not currently a preferred site. Irregular shape site. Mineral safeguarding area. Proximity to West Coast mainline. Conservation area & listed building proximity.
MD34	R18	9.28	Madeley & Betley	Land East of Bowsey Wood Road, Madeley	Housing	Rejected	The site is not currently a preferred site. Mineral safeguarding area. Access via Bowsey Wood Road has no public footpaths or street lighting. Topography. Tree Preservation Order on site.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
MD39	R18	1.30	Madeley & Betley	Land at Red Lane, Wayside, Madeley	Housing	Rejected	The site is not currently a preferred site. Constrained access via Red Lane which is a single lane track with no public footpaths or street lighting. Mineral safeguarding area.
MD40	R18	0.24	Madeley & Betley	Land adjacent to Fern Dene, Madeley	Housing	Rejected	The site is not currently a preferred site. Mature trees on site. Sewage works to the north could raise amenity concerns (odour). Mineral safeguarding area.
MD56	R18	14.84	Madeley & Betley	Land off Heighly Castle Way, Madeley	Housing	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. A Site of Biological Importance occupies the whole site (Madeley Manor). Surface water flood risk (1 in 30 years). Mineral safeguarding area. Coal Authority High Risk Area. TPO.
LW6	R18	3.15	Maer & Whitmore	Land adjacent Moss Farm, Baldwins Gate	Mixed use	Rejected	This site is not currently preferred as development would result in an adverse impact on Chorlton Moss.
LW7	R18	16.72	Maer & Whitmore	Land off Whitmore Road	Housing	Rejected	This site is not currently preferred as access to site is constrained.
LW9	R18	0.60	Maer & Whitmore	Land Adjacent to Slaters Stone Road Hill Chorlton	Housing	Rejected	The site is not currently a preferred site. A previous application on the site was refused due to development being harmful on character of area. On a steep incline making development unsuitable.
LW24	R19	0.39	Maer & Whitmore	Land off Coombesdale Hill, Chorlton	Housing	Rejected	The site is not currently a preferred site. This is a greenfield site with limited access to services and facilities. Access to the site is constrained and the site is within 800m of Maer Conservation Area / Maer Hall Registered Park and Gardens and Broughton Plantation and Coombes Dale Sites of Biological Importance.
LW38	R18	2.72	Maer & Whitmore	Land corner of A53 and Sandy Lane, Baldwin's Gate	Housing	Rejected	The site is not currently preferred due to concerns over access arrangements into the site and the loss of agricultural land.
LW42	R18	0.93	Maer & Whitmore	Land West of Manor Road, west of Baldwin's Gate	Housing	Rejected	The site is not currently preferred as it is located in between 2 neighbouring properties therefore access to site is constrained. The site is isolated and disconnected from the development boundary of Baldwin's Gate and has poor access to a range of services and facilities.
LW48	R18	3.31	Maer & Whitmore	Land at Chorlton Moss, Baldwin's Gate	Housing	Rejected	This site is not currently preferred as it is heavily wooded. Access to site is also constrained.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
LW74	R18	12.82	Maer & Whitmore	Land at Baldwin's Gate Farm, Site B	Housing	Selected	The site is currently a preferred site as it is a commitment post 31 March 2023. The site was granted outline planning permission at appeal on the 12 July 2023.
LW78	R18	0.99	Maer & Whitmore	The Elms, Sandy Lane, Baldwins Gate	Housing	Rejected	The site is not currently preferred due to access concerns and loss of agricultural land.
LW83	R18	0.66	Maer & Whitmore	Land adjacent Acreswood, Baldwins Gate	Housing	Rejected	This site is not currently preferred as it has poor access to services and facilities.
LW84	R18	2.33	Maer & Whitmore	Land North of Stone Road, Baldwins Gate	Housing	Rejected	This site is not currently preferred as it has poor access to services and facilities.
LW86	R18	2.11	Maer & Whitmore	Land to the rear of Slaters Village, Baldwins Gate	Mixed use	Rejected	This site is not currently preferred as it has poor access to services and facilities.
LW91	R19	1.04	Maer & Whitmore	Land north of Aston Lane, Aston	Housing	Rejected	The site is not currently preferred as it is a greenfield site. Access is constrained as entry could only be achieved via Aston Lane which is narrow, lined with hedgerows and has no public footpaths or street lighting. Proximity of listed buildings & their setting, as well as wider landscape sensitivities. Risk of further encroachment into countryside. A number of mature trees & hedgerows are found. The site also has poor access to services and facilities.
NC5	R19	8.12	Newchapel & Mow Cop	Land south of Harriseahead Lane, Harriseahead	Housing	Rejected	The site is not currently preferred as it is a greenfield site. It has a moderate contribution to the Green Belt and any development would contribute to the urban sprawl of the settlements of Harriseahead and Kidsgrove. Given the public footpaths along the south east boundary and the centre of the site, and the only access point being Harriseahead Lane, there is no current access to the southern portion of the site. Harriseahead is also a narrow lane and junction improvements would be required. Overhead pylon on site. Mature trees on site. Land is marshy and undulating.
NC13	R18	3.20	Newchapel & Mow Cop	Land West of Bullockhouse Road, Harriseahead	Housing	Selected	The site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of the borough subject to a new boundary being created between the site and the Green Belt and appropriate fowl and surface water drainage and water management evidence.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
NC77	R18	3.06	Newchapel & Mow Cop	Bent Farm, Newchapel	Mixed use	Rejected	The site is not currently a preferred site in the Local Plan. The site is a greenfield site. It is a site in the Green Belt and makes a strong contribution to Green Belt purposes. The site overlaps into the administrative area of Stoke-on-Trent with cross boundary considerations. In terms of locational sustainability, the site has poor access to certain services and facilities but is in close proximity to a bus stop. The site is in a coal authority high risk area. A public rights of way runs through the site. Access would need to be confirmed from Newtown / Turnhurst Road. There is a surface water flood risk on the site which would require mitigation.
NC78	R18	5.03	Newchapel & Mow Cop	Land south of Pennyfield Road, Newchapel	Housing	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. There are also access concerns into the site.
NC80	R18	8.78	Newchapel & Mow Cop	Land south of Mow Cop Road, Mow Cop	Housing	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. The site is of scale and part of the site was formerly used as a brickwork / landfill site. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts
NC81	R18	6.16	Newchapel & Mow Cop	Mellors Bank, Mow Cop Road, Mow Cop	Housing	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. There are also concerns as to access arrangements into the site. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts
NC83	R18	0.28	Newchapel & Mow Cop	Blue Pot Farm, Alderhay Lane, Rookery	Housing	Rejected	The site is currently non preferred as it is in the Green Belt and disconnected from the urban area with poor access to a range of services.
SP2	R18	0.26	Silverdale	Cheddar Drive, Silverdale	Housing	Selected	The site is currently a preferred site as it will make a contribution to the development requirements of the borough. The site has previously had planning approval for residential development accepting the principle of residential development on the site.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
SP11	R18	75.74	Silverdale	Former Keele Municipal Golf Course	Housing	Selected (in separate parcels)	The site is currently a preferred site in the Local Plan as through the development of the four identified parcels referred to immediately below - SP11(1), SP11(2), SP11(3), SP11(4) – it can make a contribution to the overall development requirements in the borough, subject to the creation of a suitable boundary with the Green Belt
SP11 (1)	R19	7.22	Silverdale	Former Keele Municipal Golf Course	Mixed-use (Housing and local centre)	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP11 (2)	R19	9.83	Silverdale	Former Keele Municipal Golf Course	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP11 (3)	R19	5.08	Silverdale	Former Keele Municipal Golf Course	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP11 (4)	R19	3.40	Silverdale	Former Keele Municipal Golf Course	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP12	R18	2.01	Silverdale	Site off Glenwood Close, Silverdale	Housing	Rejected	The site is currently a non-preferred site in the Local Plan. This is a greenfield site which makes a moderate contribution to Green Belt purposes. The Green Belt position on the site may be influenced by future decisions regarding the wider SP11 site. There are access concerns into the site and potential impacts on a site in the open space assessment (2022). The site is also adjacent to Jobs Wood Natural Greenspace. There are a number of mature trees on site including 2 trees with preservation orders on them. The site is grade 3 agricultural land classification.
SP14	R18	10.68	Silverdale	Site at Gallowtree Roundabout, Silverdale	Housing	Rejected	The site is not currently a preferred site. Steep topography prohibits development.
SP22	R18	0.70	Silverdale	Former playground off Ash Grove, Silverdale	Housing	Selected	The site is currently a preferred site as it will make a contribution to the development requirements of the borough as a brownfield site.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
SP23	R18	5.20	Silverdale	Land at Cemetery Road / Park Lane	Housing	Rejected	This assessment has been updated at Regulation 19 stage following additional information received from the site promotor.
SP23	R19	9.21	Silverdale	Land at Cemetery Road / Park Lane	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt and be considered alongside SP11(4).
BW1	R19	6.50	Talke & Butt Lane and Bradwell	Chatterley Valley, Lowlands Road, Bradwell	Employment	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution towards the overall employment land development requirements in the Borough.
BL3	R18	9.28	Talke & Butt Lane and Bradwell	Land at Slacken Lane, Talke (1)	Housing	Rejected	The site is currently not currently preferred as it is a greenfield site. There are concerns over highways access into the site. There are also heritage, amenity, topographical issues and concerns regarding the loss of mature trees on site. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts.
BL4	R19	5.91	Talke & Butt Lane and Bradwell	Land at Slacken Lane	Housing	Rejected	The site is currently not currently preferred as it is a greenfield site. There are concerns over highways access into the site. There are also heritage, amenity, topographical issues and concerns regarding the loss of mature trees on site. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts.
BL8	R18	1.42	Talke & Butt Lane and Bradwell	Land adjacent to roundabout at West Avenue, Kids Grove	Mixed use	Selected	The site is a preferred site in the Local Plan as it makes a contribution to the development requirements of the borough. The site previously had planning permission for residential development and so the site is considered suitable for residential uses, in principle.
BL18	R18	13.45	Talke & Butt Lane and Bradwell	Clough Hall Playing Fields, Talke	Housing	Rejected	This assessment has been updated at Regulation 19 stage following the identification of a need to retain playing pitches on the site and in response to consultation responses at Regulation 18 stage.
BL18	R19	13.45	Talke & Butt Lane and Bradwell	Clough Hall Playing Fields, Talke	Housing	Selected	The site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements in the borough subject to a new boundary being created between the site and the Green Belt and appropriate drainage being provided for.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
BL24	R18	0.27	Talke & Butt Lane and Bradwell	Land adjacent 31 Banbury Street, Talke	Housing	Rejected	The site is a non preferred site in the Local Plan. It is a brownfield and vacant site which has previously had planning permission for residential development. However, there are concerns over flooding impacts from the site and access impacts onto the local road network.
BL32	R18	0.85	Talke & Butt Lane and Bradwell	Land at Congleton Road, Butt Lane	Mixed use	Selected	The site is a preferred site in the Local Plan as it makes a contribution to the development requirements of the borough. It is expected that highways access is to be taken from Knowles View.
TK6	R18	0.46	Talke & Butt Lane and Bradwell	Site at Coalpit Hill, Talke	Housing	Selected	The site the site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of the borough. The site is in the urban area and in an existing residential setting. The Economic Needs Assessment indicated that the site was more suited to residential development.
TK10	R18	5.33	Talke & Butt Lane and Bradwell	Land at Crown Bank, Talke	Housing	Selected	The site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of the borough subject to a new boundary being created between the site and the Green Belt and appropriate consideration of the site's proximity to the Talke Conservation Area.
TK17	R18	1.24	Talke & Butt Lane and Bradwell	Land off St Martins Road, Talke	Housing	Selected	The site the site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of Kidsgrove subject to a new boundary being created between the site and the Green Belt.
TK18	R18	32.51	Talke & Butt Lane and Bradwell	Jamage South, Land North of A500	Mixed use	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. Ancient woodland, Local Nature Reserve and a Site of Biological Importance (all part of Parrot's Drumble) adjoins the majority of the western boundary. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts.
TK24	R18	1.38	Talke & Butt Lane and Bradwell	Land off Coppice Road, Talke (1)	Housing	Rejected	The site is currently non preferred as it is a greenfield site that makes a moderate contribution to Green Belt purposes. There are also concerns regarding the loss of agricultural land and surface water flooding impacts. The site has limited access to a range of services and facilities.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
TK25	R18	22.79	Talke & Butt Lane and Bradwell	Land South of Audley Road and West of Pit Lane	Mixed use	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. A site of biological importance, local nature reserve and ancient woodland (Parrot's Drumble) adjoins the south western boundary. The site has poor access to a range of services and facilities. The site is significant in scale, with associated highways, infrastructure and character and appearance impacts.
TK27	R18	2.82	Talke & Butt Lane and Bradwell	Land off Coppice Road, Talke (2)	Housing	Selected	The site is considered a preferred site in the Local Plan as it will make a contribution to the development requirements of the borough subject to a new boundary being created between the site and the Green Belt.
TK29	R19	0.65	Talke & Butt Lane and Bradwell	Land at the end of Oak Tree Lane, Talke	Housing	Rejected	The site is currently non preferred as it is a greenfield site. It is in the Green Belt and is being promoted for roadside uses including an electric car charging station. The site is disconnected but in relatively close proximity to the Kidsgrove urban area. The Economic Needs Assessment grades the site as 'average', and recognizes that the site could be suited for employment or roadside uses. Overhead power line and Development high risk areas on site. The site has access to some services and facilities. The site consists of grade 4 or 5 agricultural land. The topography of the site is mostly flat and there are no environmental or heritage assets within or immediately adjacent to the site. As the site is in the Green Belt, it is not considered at this time that there is sufficient evidence for the exceptional circumstances required to take the site out of the Green Belt for a roadside use, including electric charging.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
TK30	R18	66.37	Talke & Butt Lane and Bradwell	Land off Talke Road and A500, Talke	Mixed use	Rejected	The site is currently non preferred as it is a greenfield site. It is the Green Belt and makes a moderate contribution to Green Belt purposes. The site is adjacent to Bignall End Coal Yards Local Wildlife Site. The site consists of Grade 3 agricultural land. The site contains areas of potential contamination and mining history that would require mitigation / further assessment. The site is in close proximity to Grade II listed Wedgewood Monument. The site has been assessed through the Strategic Employment Sites Assessment which has indicated that there are potential issues to overcome including highways, historic land contamination / mining activity, ecology, topography, and impacts on the setting of the Wedgewood Monument. The site has poor access to a range of services and facilities.
TK45	R18	6.65	Talke & Butt Lane and Bradwell	Land North of Peacock Hay Road, Chatterley Valley	Employment	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. The site has poor access to a range of services and facilities. Part of the site is identified in the Open Space Strategy and there are potential site specific issues including the presence of overhead power lines etc.
TK46	R18	8.26	Talke & Butt Lane and Bradwell	Jamage North Reclamation Site, Talke	Housing	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. Part of the site is wooded and there are also access concerns and amenity issues given the sites proximity to the A500. There may also be site specific contamination issues.
TK47	R18	21.14	Talke & Butt Lane and Bradwell	Land North of Peacock Hay Road, Chatterley Valley	Employment	Rejected	The site is currently non preferred as it is a greenfield site that makes a strong contribution to Green Belt purposes. The site is adjacent to ancient woodland and a site of biological importance. The site has poor access to a range of services and facilities.
TB6	R18	0.34	Thistleberry	Former Pool Dam Pub Site, Orme Road, Poolfields, Newcastle	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough as a brownfield site.
TB19	R18	45.44	Thistleberry	Land south of Newcastle Golf Club, Whitmore Road	Mixed use	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to creating a defensible boundary with the Green Belt.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
TB23	R18	4.37	Thistleberry	Land West of Galingale View, Thistleberry	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough.
TB24	R18	2.16	Thistleberry	Land north of Butt's Walk, Gallowtree Roundabout	Housing	Rejected	The site is not currently a preferred site. Steep topography prohibits development and close proximity to roundabout presents access constraints.
MB12	R18	0.12	Town Centre and May Bank	Stoneyfields Court, May Bank	Housing	Rejected	The site is currently a non-preferred site in the Plan. It is currently a garage block and there is uncertainty about the current use of the garages and whether the site is available for development in its entirety.
MB13	R18	0.23	Town Centre and May Bank	Hyacinth Court, May Bank	Housing	Rejected	The site is currently a non-preferred site in the Plan. It is currently a garage site and removing the garage may reduce car parking provision in the area. There may be some amenity concerns with the impacts on adjacent properties. The site is in close proximity to the Brampton Conservation Area
MB15	R18	0.11	Town Centre and May Bank	The Hollies, May Bank	Housing	Rejected	The site is currently a non-preferred site in the Plan. It is currently a garage block and there is uncertainty about the current use of the garages and whether the site is available for development in its entirety.
TC7	R18	1.92	Town Centre and May Bank	Land bound by Ryecroft, Ryebank, Merrial Street, Corporation Street and Liverpool Road, Newcastle	Mixed use	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC19	R19	0.10	Town Centre and May Bank	Hassell Street Car Park	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC20	R19	0.34	Town Centre and May Bank	King Street Car Park	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC22	R18	0.35	Town Centre and May Bank	Marsh Parade, Newcastle (former Zanzibar night club)	Mixed use	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
TC40	R18	0.20	Town Centre and May Bank	Car Park, Blackfriars Road, Newcastle	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC45	R18	0.30	Town Centre and May Bank	York Place, Newcastle Town Centre	Mixed use	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC50	R19	0.07	Town Centre and May Bank	Cherry Orchard Car Park	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC52	R19	0.35	Town Centre and May Bank	Goose Street Car Park	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
TC71	R19	0.33	Town Centre and May Bank	Midway Car Park	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough. It is a brownfield site located in the urban area with access to services and facilities
Site 1	R18	1.40	Gypsy and Traveller Sites	A53, near shell garage, Bradwell	Gypsy and Traveller	Rejected	The site is currently non preferred. The site is heavily wooded. Access is constrained and the site is in a Green Belt location.
Site 2	R18	0.59	Gypsy and Traveller Sites	Land at Loomer Road, Holditch & Chesterton	Gypsy and Traveller	Rejected	The site is currently non preferred. The site is in the Green Belt and is a greenfield site
Site 3	R18	0.79	Gypsy and Traveller Sites	Paddocks off Wereton Road, Audley	Gypsy and Traveller	Rejected	The site is currently non preferred. The site is in the Green Belt and is a greenfield site
Site 4	R18	0.56	Gypsy and Traveller Sites	Land off Parkhouse Industrial Estate (West), Holditch & Chesterton	Gypsy and Traveller	Rejected	The site is currently non preferred. The site is existing open space. Access is constrained and is heavily wooded.
Site 5	R18	1.65	Gypsy and Traveller Sites	Land at Whitmore Road, Westlands	Gypsy and Traveller	Rejected	The site is currently non preferred. The site is identified as high quality / high value open space. Access is constrained.
Site 6	R18	1.87	Gypsy and Traveller Sites	Birchenwood way, Kidsgrove	Gypsy and Traveller	Rejected	The site is currently non preferred. The site is identified as high quality / high value open space.

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason for selection / rejection provided by NuLBC
Site 7	R18	0.03	Gypsy and Traveller Sites	Land east of Station Road, Newchapel	Gypsy and Traveller	Rejected	The site is currently non preferred. The site has temporary planning permission for one pitch but is not considered suitable for allocation at this time.
Site 8	R19	2.60	Gypsy and Traveller Sites	Land off Cemetery Road, Silverdale	Gypsy and Traveller	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution towards the overall development requirements identified in the Local Plan.
Site 9	R19	0.57	Gypsy and Traveller Sites	Silverdale Road Site (adj to Rowan Court)	Gypsy and Traveller	Rejected	The site is currently a non-preferred site in the Local Plan. It is adjacent to an open space green corridor. It is close to a local nature reserve (pool dam marshes). There are areas of flood zone 2 & 3 on the site and potential surface water flooding (1in30years)
Site 10	R19	0.75	Gypsy and Traveller Sites	Silverdale Road Site (Opp Ironbrige Drive)	Gypsy and Traveller	Rejected	The site is currently a non-preferred site in the Local Plan. The site is open space (Silverdale Road Corridor), it is adjacent to Pooldam Marshes nature reserve. It is adjacent to Flood Zone 2 & 3 and contains areas of surface water flooding.
Site 11	R19	0.81	Gypsy and Traveller Sites	Land at Hardingswood, Kidsgrove	Gypsy and Traveller	Selected	The site is currently a preferred site in the Local Plan as it is an existing site and it is considered that the site could potentially contribute towards meeting the requirements identified in the Local Plan.

Appendix J: Site Policy Assessments

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J.1 Overview

J.1.1 Introduction

- J.1.1.1 This appendix provides an assessment of the 45 site allocation policies proposed by Newcastle-under-Lyme Borough Council (NuLBC) for the emerging Local Plan at the Regulation 19 stage.
- J.1.1.2 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**).
- J.1.1.3 The site policy assessments have been prepared in accordance with the methodology as set out in **Chapter 4** of the Main Regulation 19 SA Report (see **Volume 2**).
- J.1.1.4 The site allocation policies relate to proposed development sites which have also been assessed as part of the reasonable alternative site assessments in the SA process, based on the site assessment methodology as presented in **Appendix E**. As such, the assessment of site policies has drawn on the findings from the post-mitigation evaluation of reasonable alternative sites (see **Appendix H**), but also takes into account the further site-specific information and mitigation proposed through the site policies for the 45 sites which have been selected for allocation.
- J.1.1.5 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- J.1.1.6 The policies assessed within this appendix are based on the most up to date policy wording at the time of assessment, provided by NuLBC on 17th June 2024. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording changes to the policies compared to that within the Regulation 19 Consultation version of the Local Plan.

J.1.2 Overview of policy assessments

- J.1.2.1 The impact matrices for all site policy assessments are presented in **Table J.1.2**. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table J.1.1: Summary of site policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB2	0	-	0	-	0	0	0	-	-	0	0	++
AB12	0	0	0	0	+	0	0	-	-	++	-	0
AB15	+/-	0	0	0	+	0	0	-	-	+	-	0
AB33	0	0	0	0	+	0	0	-	-	+	-	0
BW1	+	-	-	++	+	0	0	-	-	++	-	+
CT1	+	-	0	++	+	0	0	-	-	++	+	0
CH13	+/-	0	0	+	0	0	0	+	0	0	0	0
CH14	0	0	0	+	+	0	0	+	0	+	0	0
CT20	+/-	0	--	++	+	0	0	-	-	0	+	+
KL13	+	-	-	-	+	0	0	-	-	++	0	0
KL15	+	-	0	-	+	0	0	-	-	++	-	++
KG6	+/-	-	+	+	+	0	0	+	-	+	++	0
G&T11	+/-	-	+	+	0	0	0	+	-	+	++	0
KS3	0	0	0	+	+	0	0	+	0	++	0	0
KS11	+/-	0	+	+	+	0	0	+	0	+	0	0
KS17	0	0	0	+	+	0	0	+	0	+	0	0
KS18	+/-	0	+	+	+	0	0	+	0	+	0	0
KS19	+/-	0	+	+	+	0	0	+	-	+	-	0
LW53	+/-	0	0	-	+	0	0	+	-	++	-	0
MD29	+/-	-	0	-	+	0	0	-	-	++	0	0
NC13	+	0	-	++	+	0	0	-	-	+	-	0
SP2	+/-	0	0	++	+	0	0	+	-	++	-	0
SP11 (1, 2, 3, 4)	+	-	0	-	+	0	0	-	0	++	+	0
SP22	+/-	0	0	++	+	0	0	+	0	++	-	0
SP23	+	-	--	-	+	0	0	-	-	++	0	0
G&T8	+/-	-	0	+	0	0	0	+	-	++	++	0
BL8	+/-	0	0	+	+	0	0	+	0	++	0	+
BL18	0	-	0	+	+	0	0	-	-	0	++	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
BL32	+/-	-	-	+	+	0	0	+	-	+	++	+
TK6	0	0	0	+	+	0	0	-	-	++	0	0
TK10	+	0	-	-	+	0	0	-	-	+	0	0
TK17	+	-	-	++	+	0	0	-	-	++	0	0
TK27	+	0	-	-	+	0	0	-	-	++	0	0
TB6	+/-	-	+	-	+	0	0	+	0	++	0	0
TB19	+	-	0	--	+	+	0	-	-	++	-	++
TB23	+/-	-	-	-	0	0	0	+	-	+	0	0
TC7	0	-	0	++	+	0	0	+	++	+	0	+
TC19	+/-	-	0	++	+	0	0	+	++	+	0	0
TC20	+/-	-	+	++	+	0	0	+	++	+	0	0
TC22	+/-	-	0	++	+	0	0	+	++	+	0	+
TC40	+/-	-	0	++	+	0	0	+	++	0	0	0
TC45	+/-	-	0	++	+	0	0	+	++	+	0	0
TC50	+/-	-	+	++	+	0	0	+	++	+	-	0
TC52	+/-	-	0	++	+	0	0	+	++	++	0	0
TC71	+/-	-	0	++	+	0	0	+	++	+	0	0

J.2 Audley

J.2.1.1 Sites AB2, AB12, AB15 and AB33 are identified to contribute towards meeting the development requirements of Audley in the Local Plan. Audley is located in the north west of Newcastle-under-Lyme Borough and has been identified as a rural centre in Policy PSD2.

J.2.2 Land at Junction 16 of the M6

Site reference	Site use	Employment Land (ha)	Area (ha)
AB2	Employment-led	22ha	77.35

Land at Junction 16 of the M6

Land at Junction 16 of the M6 is allocated as a high-quality strategic employment site. The site extends to 78 hectares and is allocated for around 22 hectares of employment land. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Employment will comprise offices, research and development, industrial processes, general industrial, storage and distribution and open storage. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses, research and development and industrial processes
3. Safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction established from the A500 with emergency access via Barthomley Road both delivered in Phase 1 of the development,
4. Provision for secure, high quality Heavy Goods Vehicle lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site,
5. Provision for an on-site primary sub-station to support the delivery of the site,
6. Compliance with the most recent BREEAM outstanding standard.
7. Contributions towards or direct provision of suitable on and off-site mitigation measures for any adverse impacts on the M6 (Junction 16) or other parts of the highway network (strategic and local) being implemented,
8. Appropriate measures to control impact of increased traffic movement or uses within the site on local amenity including noise and air quality on the surrounding area. This should include submission of a noise and air quality assessment and mitigation strategy.
9. The layout and development of the site will be landscape led, with roads, buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area. Green Infrastructure should also be retained and significantly enhanced across the site,
10. Retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic. Strengthened boundaries to the site, comprising landscape buffers and new areas of native woodland, and the creation of new strong, defensible boundaries to the Green Belt along the east and southern boundaries of the site.
11. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of development will respond sensitively to the setting of nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
12. Implementation of an agreed comprehensive travel plan incorporating measures to support travel to / from the development, particularly by sustainable modes. This should implement initiatives to support sustainable travel into the site, to include cycle links into the development with suitable

Land at Junction 16 of the M6

cycle parking / amenities, bus routes and demand responsive travel schemes to support workers travelling to / from the site. The Travel Plan should consider routes connecting into Newcastle-under-Lyme, Stoke-on-Trent and Cheshire East.

13. The enhancement of Public Rights of Way and Green Infrastructure Network alongside new walking / cycling routes on the site which provide for segregation between pedestrians and vehicles and are safe and secure
14. Provision of strategic open space within the northern centre of the site, including the whole of the area in between Public Footpaths Audley 9 and Audley 22 to be delivered as part of development Phase 1.
15. Provide for an integrated surface water drainage strategy that enhances landscape and amenity and provides opportunities for biodiversity improvements
16. The development should be subject to an agreed Employment and Skills Plan secured through a S.106 agreement
17. The development should include clear maintenance and management proposals to ensure the ongoing maintenance of the public realm and the environment of the site.
18. A utilities masterplan should be prepared for the site which details matters including fowl and surface water drainage
19. All development being located an appropriate distance from the gas distribution pipeline and any other infrastructure that runs through or adjacent to the site.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB2	0	-	0	-	0	0	0	-	-	0	0	++

- J.2.2.1 Site AB2 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.2.2.2 An air quality assessment and mitigation strategy will be required to minimise impacts from the M6. Although this is likely to reduce adverse impacts on air quality, it is unlikely that this will fully mitigate air quality impacts from the main road. Overall, a minor negative impact on air quality (SA Objective 2) has been identified.
- J.2.2.3 The site is situated on an area of previously undeveloped land, however this policy proposes the implementation of a landscape buffer, green infrastructure, woodland and open space provision which may help to minimise soil loss. Overall, a minor negative impact will be expected for natural resources (SA Objective 4).
- J.2.2.4 The policy requires hedgerows and Green Infrastructure (GI) provision to be retained and enhanced, as well as the creation of new areas of native woodland, which will contribute towards the conservation of ecological networks. An integrated surface water drainage strategy will be outlined within a utilities masterplan, alongside the implementation of open space provision, which are likely to provide opportunities for biodiversity and flood prevention. According to the supporting information, areas of the site will also be

managed for local wildlife including an extension to the grassland habitat. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) and flooding (SA Objective 5) will be expected.

- J.2.2.5 An HIA will be required to avoid adverse impacts on nearby heritage assets. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.2.2.6 The layout and design of the site will be 'landscape led' including enhancements to present vegetation and grassland habitats. This is likely to reduce significant impacts on the landscape, whilst ensuring development is not intrusive to views through providing fragmentation to urban form through open space, surface water drainage and GI provision. A noise assessment and mitigation strategy will also be used to avoid adverse impacts from the M6. Strong boundaries will be implemented around the site boundary in order to preserve the surrounding Green Belt. However, the site is situated within an area of 'high' sensitivity with a 'moderate' overall contribution to the purposes of the Green Belt, according to the LSCA and Green Belt study. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.2.2.7 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. The site is located away from railway stations however the policy supports sustainable and active modes of transport, including the incorporation of pedestrian and cycle routes and cycle parking, as well as connections via bus routes. Areas of open space and greenspace will also be integrated within the design of the site. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and wellbeing. On balance, health (SA Objective 9) will be expected to have a minor negative impact, and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.2.2.8 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.2.3 Land East of Diglake Street

Site reference	Site use	Indicative dwellings	Area (ha)
AB12	Residential-led	Around 125	6.35

Land East of Diglake Street

Land East of Diglake Street is allocated for residential development for around 125 dwellings. Development proposals will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being via Diglake Street (with emergency access via Raven's Lane / B5500) and pedestrian access provided via Raven's Lane / B5500, Diglake Street and the Albert Street play area,

Land East of Diglake Street

3. Provision of a parking area for local residents in the northwest corner of the site and contributions towards off-site highway improvements necessary to support the development (if required),
4. The layout and development of the site being landscape-led, with buildings and structures designed to reflect local character and grain and to ensure they are not intrusive in significant views from the surrounding area.
5. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Audley Conservation Area and nearby heritage assets, giving consideration to the HIA for the site prepared by the Council.
6. Creation of a vista from the site entrance to the Wedgewood Monument and to the layout and design of the development responding positively to the visual and historic relationship between the monument and the settlement of Bignall End.
7. Retention and enhancement of existing hedgerows on the site, including strengthening hedgerow boundaries on the north and north-west of the site and provision of a landscape buffer.
8. Strategic open space provided adjacent to the northern boundary of the site.
9. Provision of new Public Rights of Way within the site, running from Raven's Lane to the northern boundary of the site and along the whole of the northern boundary of the site to link with the Public Right of Way that runs through Albert Street play area.
10. A sequential approach being taken within the site to direct development to areas at lowest risk of flooding, taking account of flood risk from all sources, including sewer and surface water flooding.
11. All development being located an appropriate distance from the sewers and associated infrastructure adjacent to the western boundary of the site.
12. Financial contributions to improvements in the capacity of local schools and health facilities
13. Contributions towards improvements to Albert Street Play Area / Bignall End Playground

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB12	0	0	0	0	+	0	0	-	-	++	-	0

- J.2.3.1 Site AB12 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.2.3.2 The site is located in close proximity to the 'Bignall End open space' Site of Biological Importance (SBI) and the 'Bignall End Road' Biodiversity Alert Site (BAS) which will be taken into account when delivering Biodiversity Net Gain (BNG). Additionally, the policy requires hedgerows to be retained and enhanced and encourages open space provision, which will contribute towards the conservation of ecological networks. According to the supporting information, a lighting scheme will also be considered which will minimise the impacts of light pollution on wildlife. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected.
- J.2.3.3 The site is situated on an area of previously undeveloped land, however this policy proposes the implementation of a landscape buffer and open space provision which may help to minimise soil loss. The supporting information also states that a land

contamination assessment and mitigation strategy will also be required in order to take account of potential ground pollution. Consequently, a negligible impact will be expected for natural resources (SA Objective 4).

- J.2.3.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.2.3.5 A Heritage Impact Assessment (HIA) will be required to avoid adverse impacts on the Audley Conservation Area and nearby heritage assets. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets including the Grade II listed Wedgewood Monument, where a vista will be created to mitigate views from the site entrance to the listed building. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.2.3.6 The layout and design of the site will be 'landscape led' including hedgerows in order to reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. Development will reflect local character and include open space provision in the north and create strong boundaries in order to preserve the surrounding Green Belt. However, the site is situated within an area of 'high' sensitivity and has a 'strong' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.2.3.7 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. Pedestrian walkways including a new public right of way (PRoW) will link to nearby footpaths, and off-site highway improvements and parking will be implemented where required. An area of open space will be integrated alongside the northern site boundary. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.
- J.2.3.8 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.2.4 Land North of Vernon Avenue

Site reference	Site use	Indicative dwellings	Area (ha)
AB15	Residential-led	Around 33	1.55

Land North of Vernon Avenue

Land North of Vernon Avenue is allocated for residential development for around 33 dwellings. Development proposals will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development being via Vernon Avenue.

Land North of Vernon Avenue

- 3) Land contamination assessment required in relation to area of former mining activity.
- 4) The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area.
- 5) Strengthening of the western boundary and retention of hedgerow along northern site boundary with a native hedgerow and landscape buffer within the site.
- 6) All development being located an appropriate distance from the sewer that runs through the site.
- 7) Financial contributions to improvements in the capacity of schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB15	+/-	0	0	0	+	0	0	-	-	+	-	0

J.2.4.1 Site AB15 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.2.4.2 The policy requires hedgerows to be retained including a native hedgerow within the site, which will contribute towards the conservation of ecological networks. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected.

J.2.4.3 The site is situated on an area of previously undeveloped land, however this policy proposes the implementation of a landscape buffer which may help to minimise soil loss. A land contamination assessment will also be required in order to take account of potential ground pollution as a result of former mining activity. Consequently, a negligible impact will be expected for natural resources (SA Objective 4).

J.2.4.4 The landscape buffer consisting of hedgerows, located on the western boundary of the site will reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. However, the site is situated within an area of 'high' sensitivity and has a 'moderate' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment. A minor negative impact is identified overall for landscape (SA Objective 8).

J.2.4.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.

J.2.4.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

- J.2.4.7 It is recommended that the wording regarding "*an appropriate distance*" from the sewer is more clearly defined.

J.2.5 Land off Nantwich Road/Park Land Audley

Site reference	Site use	Indicative dwellings	Area (ha)
AB33	Residential-led	Around 55	2.74

Land off Nantwich Road/Park Land Audley

Land off Nantwich Road / Park Lane, Audley is allocated for residential development for around 55 dwellings. Development proposes will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Primary vehicular access being via Park Lane and secondary access via Nantwich Road.
- 3) Connectivity to existing cycle and pedestrian routes will be enhanced
- 4) The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
- 5) Heritage impact assessment required to demonstrate how the layout and design of the development will respond sensitively to the setting of the Conservation Area and nearby heritage assets, giving consideration to the HIA for the site prepared by the Council.
- 6) A sequential approach will be taken within the site to direct development to areas of least risk of flooding, taking account flood risk from all sources including surface water flooding.
- 7) Development layout will consider proximity to sewers adjacent to the boundaries of the site and provide for appropriate distances away from such assets.
- 8) A land contamination assessment and mitigation strategy is required in relation to area of former mining activity.
- 9) Contributions and accessibility improvements to Alsager Road Play Area / Audley Park.
- 10) Financial contributions to improvements of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB33	0	0	0	0	+	0	0	-	-	+	-	0

- J.2.5.1 Site AB33 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.2.5.2 The policy requires hedgerows to be retained and enhanced, which will contribute towards the conservation of ecological networks. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected.
- J.2.5.3 The site is situated on an area of previously undeveloped land, however this policy proposes the implementation of a landscape buffer which may help to minimise soil loss. A land contamination assessment and mitigation strategy will also be required in order to

- take account of potential ground pollution. Consequently, a negligible impact will be expected for natural resources (SA Objective 4).
- J.2.5.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.2.5.5 A Heritage Impact Assessment (HIA) will be required to avoid adverse impacts on the Audley Conservation Area and nearby heritage assets. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.2.5.6 The layout and design of the site will be 'landscape led' whilst ensuring development is not intrusive to views. However, the site is situated within an area of 'high' sensitivity and has a 'strong' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.2.5.7 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. There will be enhancements to connect the site to cycling and pedestrian pathways, encouraging sustainable and active travel routes. However, access still remains poor for health and educational facilities, as site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. A minor negative impact has been identified for health and wellbeing (SA Objective 9) and transport and accessibility (SA Objective 11).
- J.2.5.8 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.
- J.2.5.9 It is recommended that the wording regarding "*appropriate distances*" from the sewer is more clearly defined.

J.3 Bradwell

- J.3.1.1 Site BW1 has been identified to contribute towards meeting the development requirements of Bradwell in the Local Plan. Bradwell is located in the north east of Newcastle-under-Lyme Borough and has been identified as a strategic centre in line with Policy PSD2.

J.3.2 Chatterley Valley, Lowlands Road

Site reference	Site use	Employment Land (ha)	Area (ha)
BW1	Employment-led	6.4	6.5

Chatterley Valley, Lowlands Road

Land at Chatterley Valley is allocated for employment development of around 6.4 hectares. Development proposes will be permitted subject to

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
- 2) Access to the development being via Lowlands Road
- 3) Employment uses may comprise offices, research and development, industrial processes, general industrial, storage and distribution and open storage. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses, research and development and industrial processes
- 4) A coal mining risk assessment, land contamination assessment and mitigation strategy is required in relation to the area of former mining activity
- 5) A sequential approach will be taken within the site to direct development to areas of least risk of flooding, taking account flood risk from all sources including surface water flooding
- 6) Appropriate ecological buffers will be applied to Bathpool Park (Site of Biological Importance)
- 7) Minerals Safeguarding Area assessment is required

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
BW1	+	-	-	++	+	0	0	-	-	++	-	+

- J.3.2.1 Site BW1 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.3.2.2 The policy requires “appropriate buffers” to be given to the SBI ‘Bathpool Park’ which is located in close proximity of the site, although the policy will benefit from the word ‘appropriate’ being more clearly defined. However, the site is located within an area of ‘medium’ habitat distinctiveness. Subject to no significant effects being identified with the HRA, a minor negative impact on biodiversity (SA Objective 3) will be expected.

- J.3.2.3 The site is situated within a Mineral Safeguarding Area (MSA), however the policy requires any issues associated with the MSA to be identified and addressed, alongside a land contamination and coal mining risk assessment. Due to the location of the site away from BMV soil, as well as the nearby location of a waste management facility, an overall major positive impact will be expected for natural resources (SA Objective 4).
- J.3.2.4 There will be a full evaluation on the risk of surface water flooding, which is likely to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.3.2.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.4 Crackley and Red Street

- J.4.1.1 Site CT1 has been identified to contribute towards meeting the development requirements of Crackley and Red Street in the Local Plan. Crackley and Red Street is located in the north east of the Newcastle-under-Lyme Borough and has been identified as a strategic centre in line with Policy PSD2.

J.4.2 Land at Red Street and High Carr Farm, Chesterton

Site reference	Site use	Indicative dwellings	Area (ha)
CT1	Residential-led	530	19.43

Land at Red Street and High Carr Farm, Chesterton

Land at Red Street and High Carr Farm is allocated for residential development for around 530 dwellings and a local centre and a primary school. Development proposals will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being:-
 - a) Via a left in / left out junction on the A34, utilising and improving the existing Bell's Hollow Junction onto the A34.
 - b) Provision of two access points along Talke Road
3. Access requirements set out in criterion 2 should include appropriate speed reduction and traffic calming schemes to facilitate safe access into the site.
4. In line with Policy SA1 (General Requirements), a masterplan should be prepared and agreed for the site which will
 - a) Consider sustainable travel links including cycle and pedestrian connectivity including to public transport links. Development should also consider walking and active travel for health and wellbeing purposes within the site
 - b) provide for an appropriate boundary treatments to the existing Green Belt
 - c) Facilitate improvements to local footpaths and street lighting along Talke Road / Bells Hollow
 - d) Achieve high quality design reflecting the landscape location of the site and creating a vibrant destination and attractive public realm. This should recognise the transitional location between the higher density urban and rural area.
 - e) Ensure the layout and development of the site is landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area including the Wedgewood Monument,
 - f) Provide for a local centre within the site to meet local retail needs
5. Submission of a land contamination assessment and mitigation strategy,
6. Submission of a coal mining risk assessment and mitigation strategy,
7. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
8. Submission of a noise assessment and mitigation strategy in relation to the impact of noise from the A34 Newcastle Road, farm and industrial operations in and in close proximity to the site.
9. Submission of an odour assessment and potential mitigation given adjacent farm and industrial uses
10. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CT1	+	-	0	++	+	0	0	-	-	++	+	0

- J.4.2.1 Site CT1 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.4.2.2 A noise assessment and mitigation strategy, as well as an odour assessment with potential mitigation, will be required to minimise impacts from the A34 and surrounding farming infrastructure. However, the policy may benefit from wording related to mitigating air quality. Overall, a minor negative impact on air quality (SA Objective 2) has been identified.
- J.4.2.3 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. Due to the location of the site away from BMV soil, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).
- J.4.2.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.4.2.5 The site will be designed to avoid having adverse impacts on views from Grade II Listed Building Wedgewood Monument. A negligible impact has been identified for cultural heritage (SA Objective 7).
- J.4.2.6 The layout and design of the site will be 'landscape led' in order to reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. A noise assessment and mitigation strategy will be used to avoid adverse impacts from the A34 and surrounding farming infrastructure. Development will reflect the density of being positioned in an area of urban to rural transition, and create 'appropriate' boundaries in order to preserve the surrounding Green Belt, which would benefit from being more clearly defined. Additionally, the site is situated within an area of 'medium' sensitivity according to the LSCA. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.4.2.7 It will be a requirement for the developer to provide financial contributions to local health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. Proposed improvements to pedestrian and cycle links are also likely to encourage active travel. An odour assessment and mitigation strategy will also be required. However, site assessments presented in **Appendix H** indicate poor access across indicators for health. On balance, health (SA Objective 9) will be expected to have a minor negative impact.

- J.4.2.8 Improvements to pedestrian and cycle links to and within the site are likely to encourage sustainable and active travel, including improvements to footpaths along Talke Road. The supporting information also proposes enhancements to the PRow connected to the south of the site. Public transport improvements will likely expand connectivity to the site to local facilities, and a new local centre proposed within the site is likely to further improve access to local services. Additionally, the developers will be expected to make financial contributions to the capacity of local schools. Overall, a minor positive impact has been identified for transport and accessibility (SA Objective 11).
- J.4.2.9 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.5 Cross Heath

- J.5.1.1 Sites CH13 and CH14 are identified to contribute towards meeting the development requirements of Cross Heath in the Local Plan. Cross Heath is located in the north east of the Newcastle-under-Lyme Borough and has been identified as a strategic centre in line with Policy PSD2.

J.5.2 Castletown Grange, Douglas Road, Cross Heath

Site reference	Site use	Indicative dwellings	Area (ha)
CH13	Residential-led	-7	0.59

Castletown Grange, Douglas Road, Cross Heath

Land at Castletown Grange is allocated for residential development to rationalise the use of the site

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Development of the site will include a rationalisation of the site and the demolition of existing units onsite.
- 3) Access to the development via Ronaldsway Drive
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 5) The existing mature trees on the site edge should be retained and integrated into the development layout wherever possible, considering their impact during the design phase.
- 6) Financial contributions to improvements in the capacity of local schools.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CH13	+/-	0	0	+	0	0	0	+	0	0	0	0

- J.5.2.1 Site CH13 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.5.2.2 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A negligible impact is identified for flooding (SA Objective 5).
- J.5.2.3 The policy requires existing mature trees within the site to be retained, which will contribute towards the conservation of ecological networks. This also has potential to provide fragmentation urban form within the site to help mitigate impacts on landscape views. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected, and a minor positive impact on landscape (SA Objective 8) will be expected.

J.5.2.4 It will be a requirement for the developer to provide financial contributions to local schools. Although the site is located away from railway stations, it is located in close proximity to other sustainable and active modes of travel including bus routes which may improve access to the railway station. Transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

J.5.2.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.5.3 Maryhill Day Centre, Wilmot Drive, Cross Heath

Site reference	Site use	Indicative dwellings	Area (ha)
CH14	Residential-led	Around 30	0.69

Maryhill Day Centre, Wilmot Drive, Cross Heath

Land at Maryhill Day Centre is allocated for residential development for around 30 dwellings. Development will be permitted subject to:

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements
- 2) Access to the development via Wilmot Drive.
- 3) Noise impact assessment and mitigation strategy required in relation to impact of Lymedale Cross Industrial Estate,
- 4) The existing trees on site should be retained and integrated into the development layout wherever possible, considering their impact during the design phase.
- 5) Odour and lighting assessments and mitigation strategies required in relation to Lymedale Cross Industrial Estate.
- 6) Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CH14	0	0	0	+	+	0	0	+	0	+	0	0

J.5.3.1 Site CH14 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.5.3.2 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).

J.5.3.3 The policy requires existing mature trees within the site to be retained, which will contribute towards the conservation of ecological networks. This also has potential to provide fragmentation of urban form within the site to help mitigate impacts on landscape views. A noise assessment and mitigation strategy will be required to minimise impacts from the Lymedale Industrial Estate, and a lighting assessment will also be implemented. Subject to no significant effects being identified with the HRA, a negligible impact on

- biodiversity (SA Objective 3) will be expected, and a minor positive impact on landscape (SA Objective 8) will be expected.
- J.5.3.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although the site is located away from railway stations, it is located in close proximity to other sustainable and active modes of travel including bus routes which may improve access to the railway station. Health and wellbeing (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.5.3.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.6 Holditch and Chesterton

J.6.1.1 Site CT20 has been identified to contribute towards meeting the development requirements of Holditch and Chesterton in the Local Plan. Holditch and Chesterton is located in the north east of the Newcastle-under-Lyme Borough and has been identified as a strategic centre in line with Policy PSD2.

J.6.2 Rowhurst Close, Chesterton

Site reference	Site use	Employment Land (ha)	Area (ha)
CT20	Employment-led	7.51	8.88

Rowhurst Close, Chesterton

Land at Rowhurst Close is allocated for 8.88 hectares of employment uses. Development will be permitted subject to

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Employment uses may comprise offices, research and development, industrial processes, general industrial, storage and distribution and open storage.
- 3) Access to the development being via Apedale Road / Watermills Road.
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 5) Contaminated land assessment and mitigation strategy required associated with historic landfill use.
- 6) NPPF Agent of change mitigation may be required at source.
- 7) Proximity of the Biological Alert Site (Apedale Disused Tips) being recognised, and any impacts, mitigated.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
CT20	+/-	0	--	++	+	0	0	-	-	0	+	+

J.6.2.1 Site CT20 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.6.2.2 The site is located in close proximity to the 'Apedale Disused Tips' BAS which will have any impacts identified and mitigated as a consequence of development. However, it is recommended that development is directed away from areas of the site which comprise high habitat distinctiveness. Subject to no significant effects being identified with the HRA, a major negative impact on biodiversity (SA Objective 3) has been identified.

- J.6.2.3 A land contamination assessment and mitigation strategy will also be required in order to take account of potential ground pollution from historic land and mining use. A major positive impact will be expected for natural resources (SA Objective 4).
- J.6.2.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.6.2.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.
- J.6.2.6 It is recommended that clearer wording is attributed to "*agent of change mitigation may be required at source*" to mitigate noise impacts on or from the site.

J.7 Keele

J.7.1.1 Sites KL13 and KL15 are identified to contribute towards meeting the development requirements of Keele in the Local Plan. Keele is located in the centre of the Newcastle-under-Lyme Borough and has been identified as a rural centre in Policy PSD2.

J.7.2 Keele Science Park Phase 3

Site reference	Site use	Indicative dwellings	Employment land (ha)	Area (ha)
KL13	Mixed-use	220	6	26.126

Keele Science Park Phase 3

Land at Keele Science Park Phase 3 is allocated for residential and employment development including around 220 units for student accommodation and around 6 hectares of employment land. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Employment uses will comprise business space for science-based companies, academic buildings and employment uses directly related to the University's core functions. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses, research and development and industrial processes,
3. Access to the development being via Keele Road and University Way,
4. Provision of a new and /or enhanced bus service from Newcastle-under-Lyme to Keele University and dedicated bus entrance from the A525 Keele Road (at Newcastle Lodge), bus stop and associated infrastructure.
5. The layout and development of the site will be landscape-led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
6. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Keele Hall Conservation Area, Keele Registered Park and Garden and nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
7. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
8. Appropriate ecological buffers being provided to Barkers Wood and Rosemary Hill Wood (Biodiversity Alert Areas) and Springpool Wood Site of Biological Importance,
9. The submission of contaminated land assessment and mitigation strategy in relation to historic land uses,
10. Any new building, redeveloped building or extension to an existing building, is designed to a high standard and contributes to the character of the Science Park,
11. The enhancement of the Public Rights of Way and Green Infrastructure Network.
12. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KL13	+	-	-	-	+	0	0	-	-	++	0	0

- J.7.2.1 Site KL13 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.7.2.2 "*Appropriate ecological buffers*" will be used to mitigate potential impacts on the 'Barkers Wood', 'Rosemary Hill Wood' BAS and the 'Springpool Wood SBI', although the policy may benefit from stronger wording to define the word "*appropriate*". It is also recommended that development is directed away from areas of the site which comprise high habitat distinctiveness. However, onsite GI provision may provide some benefits to biodiversity. On balance, subject to no significant effects being identified with the HRA, a minor negative impact on biodiversity (SA Objective 3) has been identified.
- J.7.2.3 A land contamination assessment and mitigation strategy will also be required in order to take account of potential ground pollution from historic land and mining use. However, the site is situated on an area of BMV soil, and consequently a minor negative impact will be expected for natural resources (SA Objective 4).
- J.7.2.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.7.2.5 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Keele Hall Conservation Area, Keele Hall Grade II Listed Building, and the Keele Hall Registered Park and Garden. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. Buildings should also contribute to the character of the surrounding area. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.7.2.6 The layout and design of the site will be 'landscape-led' whilst ensuring development is not intrusive to views. This is likely to reduce significant impacts on the landscape, as well as providing fragmentation to urban form through GI provision. However, the site is situated within an area of 'high' sensitivity according to the LSCA, which the supporting information indicates will be mitigated through retaining surrounding areas of woodland. Overall, a minor negative impact is identified for landscape (SA Objective 8).
- J.7.2.7 It will be a requirement for the developer to provide financial contributions to local health facilities. Although this has potential to increase the capacity for these facilities, planned improvements to accessibility are minimal. Proposed improvements to pedestrian and cycle links are also likely to encourage active travel. However, site assessments presented in **Appendix H** indicate poor access across indicators for health. On balance, health (SA Objective 9) will be expected to have a minor negative impact.

- J.7.2.8 Public transport accessibility will be provided through a new bus link running from Newcastle-under-Lyme to Keele University, which will include dedicated bus entrance to the site from the A525 Keele Road. Improvements to the nearby PRoW network are also supported by the policy, where the supporting information also highlights potential to enhance nearby walking and cycling links. Connections to these potential sustainable and active travel links will be considered in the design of the site. The developer will also be required to provide financial contributions to local schools. However, the site is still located away from railway stations and primary schools. Overall, a negligible impact is identified for transport and accessibility (SA Objective 11).
- J.7.2.9 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.7.3 Land South of A525 Keele

Site reference	Site use	Indicative dwellings	Employment land (ha)	Area (ha)
KL15	Mixed-use	260	13	18.05

Land South of A525 Keele

Land south of the A525 Keele is allocated for residential and employment development including around 260 dwellings for student accommodation and around 13 hectares of employment land. Development proposals will be permitted subject to:

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
- 2) Employment uses being provided comprising business space for science-based companies, academic buildings and employment uses directly related to the University's core functions. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses, research and development and industrial processes,
- 3) Access to the development being via Keele Road and University Avenue through Site KL13,
- 4) Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to Keele University and dedicated bus entrance from the A525 Keele Road (at Newcastle Lodge), bus stop and associated infrastructure,
- 5) The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
- 6) The site should deliver a link road and walking / cycling links from the A53 Whitmore Road through site allocation TB19 Land South of Newcastle Golf Club through to Keele University.
- 7) The site should provide an active travel corridor to the east to provide for cycle connectivity into the town centre
- 8) Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Keele Hall Conservation Area, Keele Registered Park and Garden and nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
- 9) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 10) Appropriate ecological buffers to Flagstaff Plantation Ancient Woodland, Barkers Wood, Rosemary Hill Wood and Hands Wood (Biodiversity Alert Areas) and Springpool Wood (Site of Biological Importance),
- 11) The submission of contaminated land assessment and mitigation strategy in relation to historic land uses,
- 12) Any new building, redeveloped building or extension to an existing building, is designed to a high standard and contributes to the character of the wider Innovation Park including Site KL13,

Land South of A525 Keele

- 13) The enhancement of the Public Rights of Way and Green Infrastructure Network,
- 14) Financial contributions to improvements in the capacity of local health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KL15	+	-	0	-	+	0	0	-	-	++	-	++

- J.7.3.1 Site KL15 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.7.3.2 "*Appropriate ecological buffers*" will be used to mitigate potential impacts on the 'Flagstaff Plantation' Ancient Woodland; Barkers Wood, Rosemary Hill Wood and Hands Wood BAS; and Springpool Wood SBI, although the policy may benefit from stronger wording to define the word "*appropriate*". Onsite GI provision may provide some additional benefits to biodiversity, as well as restricting access to woodland areas according to the supporting information. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) has been identified.
- J.7.3.3 A land contamination assessment and mitigation strategy will also be required in order to take account of potential ground pollution from historic land and mining use. However, the site is situated on an area of BMV soil, and consequently a minor negative impact will be expected for natural resources (SA Objective 4).
- J.7.3.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.7.3.5 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Keele Hall Conservation Area, Keele Hall Grade II Listed Building, and the Keele Hall Registered Park and Garden. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.7.3.6 The layout and design of the site will be 'landscape led' whilst ensuring development is not intrusive to views. This is likely to reduce significant impacts on the landscape, as well as providing fragmentation to urban form through GI provision. However, the site is situated within an area of 'high' sensitivity according to the LSCA, which the supporting information indicates will be mitigated through retaining surrounding areas of woodland. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.7.3.7 It will be a requirement for the developer to provide financial contributions to local health facilities. Although this has potential to increase the capacity for these facilities, planned improvements to accessibility are minimal. Proposed improvements to pedestrian and

cycle links are also likely to encourage active travel. However, site assessments presented in **Appendix H** indicate poor access across indicators for health. On balance, health (SA Objective 9) will be expected to have a minor negative impact.

- J.7.3.8 Public transport accessibility will be provided through a new bus link running from Newcastle-under-Lyme to Keele University, which will include dedicated bus entrance to the site from the A525 Keele Road. Improvements to the nearby PRow network are also supported by the policy, where the supporting information also highlights potential to enhance nearby walking and cycling links. Connections to these potential sustainable and active travel links will be considered in the design of the site. However, the site is still located away from railway stations, primary schools and local services. Overall transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.
- J.7.3.9 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.8 Kidsgrove and Ravenscliffe

- J.8.1.1 Sites KG6 and G&T11 (assessed as 'Site 11') are identified to contribute towards meeting the development requirements of Kidsgrove and Ravenscliffe in the Local Plan. Kidsgrove and Ravenscliffe is located in the north of the Newcastle-under-Lyme Borough and has been identified as an urban centre in Policy PSD2.

J.8.2 William Road, Kidsgrove (site of the Galley PH)

Site reference	Site use	Indicative dwellings	Area (ha)
KG6	Residential-led	Around 6	0.18

William Road, Kidsgrove (site of the Galley PH)

Land at William Road, Kidsgrove is allocated for residential development of around 6 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development being via William Road and Warwick Close.
- 3) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 4) Coal mining risk assessment, land contamination assessment and mitigation strategy required in relation to the area of former mining activity.
- 5) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KG6	+/-	-	+	+	+	0	0	+	-	+	++	0

- J.8.2.1 Site KG6 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.8.2.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. Overall, a minor positive impact will be expected for natural resources (SA Objective 4).
- J.8.2.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.8.2.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is also located in close proximity to sustainable and active

modes of travel including bus routes, however it is still located away from an NHS hospital with A&E services. On balance, health and wellbeing (SA Objective 9) will be expected to have a minor negative impact, and transport and accessibility (SA Objective 11) will be expected to have a major positive impact.

- J.8.2.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.8.3 Land at Hardings Wood Road

Site reference	Site use	Indicative dwellings	Area (ha)
G&T11	Gypsy, Traveller and Travelling Showpeople	N/A	0.82

Land at Hardings Wood Road, Kidsgrove

The land at Hardings Wood Lane, Kidsgrove, as shown on the Policies Map, is appropriate for the intensification of uses for Travelling Showperson uses, subject to:-

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Retaining existing boundary treatments to the site
3. Demonstrating that the existing access is capable of managing any increase in the number of Plots on site
4. Using permeable materials as replacement hardstanding, where required, and provide a drainage strategy to manage surface run-off from the site

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
G&T11	+/-	-	+	+	0	0	0	+	-	+	++	0

- J.8.3.1 Site G&T11 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.8.3.2 The site will be replaced with permeable materials in order facilitate improved surface water drainage and runoff from the site. A negligible impact has been identified for flooding (SA Objective 5).
- J.8.3.3 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.9 Knutton

J.9.1.1 Sites KS3, KS11, KS17, KS18 and KS19 are identified to contribute towards meeting the development requirements of Knutton in the Local Plan. Knutton is located in the north east of the Newcastle-under-Lyme Borough and has been identified as a strategic centre in line with Policy PSD2.

J.9.2 Land at Blackbank Road, Knutton

Site reference	Site use	Indicative dwellings	Area (ha)
KS3	Residential-led	Around 150	3.77

Land at Blackbank Road, Knutton

Land at Blackbank Road is allocated for residential development for around 150 dwellings. Development will be permitted subject to:

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Development should reflect masterplanning proposals for the wider Knutton area and any site specific implications
- 3) Access to the development being via the B5367, High Street
- 4) The layout and development of the site will be landscape-led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area, including on its western periphery where it meets the Green Belt
- 5) A sequential approach being taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding
- 6) Proximity of the Site of Biological Importance (SBI) to the north of KS3 being recognised, and any impacts, mitigated.
- 7) Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity
- 8) Submission of a noise assessment and mitigation strategy in relation to the impact of nearby quarry operations
- 9) Submission of an odour assessment and mitigation strategy in relation to nearby agricultural uses
- 10) Preservation of the existing Public Right of Way that adjoins the site's western boundary
- 11) Protection of the mature trees found, including their root network
- 12) Consideration of alternative sports provision, recognising the site's most recent use as school playing fields
- 13) Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS3	0	0	0	+	+	0	0	+	0	++	0	0

- J.9.2.1 Site KS3 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.9.2.2 A noise assessment and odour assessment will be required to minimise adverse impacts from the surrounding area. Overall, a negligible impact on air quality (SA Objective 2) has been identified.
- J.9.2.3 The site is located in close proximity to the 'Apedale Disused Tips' BAS and Lymedale Business Park SBI, which will have any impacts identified and mitigated as a consequence of development. Additionally, the policy required mature trees including their root network to be protected. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected.
- J.9.2.4 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. A minor positive impact will be expected for natural resources (SA Objective 4).
- J.9.2.5 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.9.2.6 The layout and design of the site will be 'landscape led' including the preservation of mature trees to reduce the likelihood for significant impacts on the landscape and where it meets the Green Belt, whilst ensuring development is not intrusive to views. A noise assessment and mitigation strategy will also be required. A minor positive impact is identified overall for landscape (SA Objective 8).
- J.9.2.7 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. Pedestrian walkways including the adjoining PRoW will be preserved, and alternative sports provision will be implemented. An odour assessment and mitigation strategy will also be required. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.9.2.8 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.9.3 Knutton Community Centre, High Street, Knutton

Site reference	Site use	Indicative dwellings	Area (ha)
KS11	Residential-led	Around 9	0.57

Knutton Community Centre, High Street, Knutton

Land at Knutton Community Centre is allocated for residential development for around 9 dwellings. Development will be permitted subject to:-

Knutton Community Centre, High Street, Knutton

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development being via Lower Milehouse Lane
- 3) Development should reflect Masterplanning proposals for the wider Knutton area and any site specific implications.
- 4) A coal mining risk assessment, land contamination assessment and mitigation strategy is required in relation to the area of former mining activity. Development should also undertake a Minerals Safeguarding Assessment.
- 5) Mature trees on the sites Lower Millhouse Lane frontage should be preserved, and consideration given to replacement amenity greenspace provision.
- 6) Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS11	+/-	0	+	+	+	0	0	+	0	+	0	0

J.9.3.1 Site KS11 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.9.3.2 The policy requires mature trees along Lower Milehouse Lane to be preserved and for lost greenspace to be replaced, which will contribute towards the conservation of ecological networks. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected.

J.9.3.3 A coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. The site is situated within a Mineral Safeguarding Area (MSA), however the policy requires any issues associated with the MSA to be identified and addressed. A minor positive impact will be expected for natural resources (SA Objective 4).

J.9.3.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. Lost amenity greenspace from site development will also be replaced. Considering the site remains located away from railway stations and leisure facilities, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

J.9.3.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.9.4 Knutton Recreation Centre, Knutton Lane

Site reference	Site use	Indicative dwellings	Area (ha)
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KS17	Residential-led	55	2.33
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Knutton Recreation Centre, Knutton Lane

Land at Knutton Recreation Centre, Knutton Lane is allocated for residential development of around 55 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development being via the High Street and Downham Road.
- 3) Development should reflect masterplanning proposals for the wider Knutton area and its site specific implications.
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 5) Public Right of Way (Newcastle 96) will be conserved and enhanced with improvements in connectivity.
- 6) Noise impact assessment and mitigation strategy required in relation to impact of nearby commercial uses.
- 7) Land contamination assessment and mitigation strategy required in relation to former mining area.
- 8) Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS17	0	0	0	+	+	0	0	+	0	+	0	0

- J.9.4.1 Site KS17 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.9.4.2 A land contamination assessment will be required in order to take account of potential ground pollution. A minor positive impact will be expected for natural resources (SA Objective 4).
- J.9.4.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A full evaluation of the risk of flooding from surface water will need to be conducted by developers. A minor positive impact is identified for flooding (SA Objective 5).
- J.9.4.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. The PRoW which coincides with the site will be preserved and enhanced with improved connectivity, and lost open space will be replaced. A noise and odour mitigation strategy will also be required. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, a minor negative impact is expected for health (SA Objective 9) and transport and accessibility (SA Objective 11).

J.9.4.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.9.5 Land North of Lower Milehouse Lane, Knutton

Site reference	Site use	Indicative dwellings	Area (ha)
KS18	Residential-led	Around 10	0.18

Land North of Lower Milehouse Lane, Knutton

Land North of Lower Milehouse Lane, Knutton is allocated for residential development of around 10 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development being via the High Street (B5367).
- 3) Development should reflect masterplanning proposals for the wider Knutton area and its site specific implications.
- 4) Transport Assessment should consider the loss of a community car park which may result in overspill of vehicles parking on street giving rise to a highway safety issue.
- 5) A coal mining risk assessment, land contamination assessment and mitigation strategy is required in relation to the area of former mining activity. Development should also undertake a Minerals Safeguarding Assessment.
- 6) A Noise impact assessment and mitigation strategy required in relation to nearby uses.
- 7) Financial contributions to improvements in the capacity of local schools and health facilities
- 8) Demolition of the car parking garages (14 in total) will be required, of which 6 are currently known to be void.
- 9) The two boulevard trees that front onto Knutton Lane should be retained.
- 10) Land contamination assessment and mitigation strategy required in relation to the area of former mining activity. Development should also undertake a Minerals Safeguarding Assessment.
- 11) Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS18	+/-	0	+	+	+	0	0	+	0	+	0	0

J.9.5.1 Site KS18 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.9.5.2 A noise assessment will be required to minimise adverse impacts from the surrounding area. Overall, a negligible impact on air quality (SA Objective 2) has been identified.

J.9.5.3 A land contamination assessment will be required in order to take account of potential ground pollution, and a coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. The site is located within an MSA, however the policy requires a minerals safeguarding assessment to be implemented. A minor positive impact will be expected for natural resources (SA Objective 4).

J.9.5.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. A Transport Assessment will be required which should consider the impacts of the loss of a car park. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

J.9.5.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.9.6 Knutton Lane

Site reference	Site use	Indicative dwellings	Area (ha)
KS19	Residential-led	Around 5	0.08

Knutton Lane

Land at Knutton Lane is allocated for residential development for around 5 dwellings. Development will be permitted subject to:-

- 1) the site satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
KS19	+/-	0	+	+	+	0	0	+	-	+	-	0

J.9.6.1 Site KS19 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report. Given that the site policy does not provide any further information beyond the provisions of Policy SA1, the assessment against the SA objectives is unchanged from the post-mitigation site assessments.

J.10 Loggerheads

J.10.1.1 Site LW53 has been identified to contribute towards meeting the development requirements of Loggerheads in the Local Plan. Loggerheads is located in the south of the Newcastle-under-Lyme Borough and has been identified as an urban centre in Policy PSD2.

J.10.2 Land at Corner of Mucklestone Wood Lane, Loggerheads

Site reference	Site use	Indicative dwellings	Area (ha)
LW53	Residential-led	Around 130	18.35

Land at the Corner of Mucklestone Wood Lane, Loggerheads

Land at Corner of Mucklestone Wood Lane is allocated for residential development for around 130 dwellings. Development proposals will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being taken via Mucklestone Wood Lane,
3. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets in Loggerheads giving consideration to the HIA for the site prepared by the Council,
4. An appropriate landscape buffer being provided along the eastern edge of the site in relation to White House Farm Grade II Listed Building,
5. Submission of land contamination assessment and mitigation strategy in relation to impact of the former Tagedale Quarry landfill site,
6. Submission of a noise impact assessment and mitigation strategy in relation to the impact of the A53, B0526 and Ranworth Lodge Kennels,
7. Submission of an assessment and mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptors.
8. Financial contributions to improvements in the capacity of local schools and health facilities
9. Financial contributions towards open space facilities listed in the Loggerheads Neighbourhood Plan
10. Off-site financial contributions to local highways improvements and bus services

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
LW53	+/-	0	0	-	+	0	0	+	-	++	-	0

J.10.2.1 Site LW53 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.10.2.2 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution from the former Tagedale Quarry landfill site.

- However, the site is situated on an area of BMV soil, and consequently a minor negative impact will be expected for natural resources (SA Objective 4).
- J.10.2.3 A principal aquifer and the Bearstone Groundwater Protection Zone is located to the north of the site, and subsequent development will prevent the deterioration of the abstraction source and protect controlled water receptors. A negligible impact has been identified for water (SA Objective 6).
- J.10.2.4 An HIA will be required to avoid adverse impacts on nearby heritage assets, including the Grade II Listed Building White House Farm where a landscape buffer will be created along the eastern edge of the site. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.10.2.5 It will be a requirement for the developer to provide financial contributions to local schools, health facilities, bus services and open space facilities. Although this has potential to increase the capacity for these facilities, these are still located away from the site. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.
- J.10.2.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.11 Madeley and Betley

J.11.1.1 Site MD29 has been identified to contribute towards meeting the development requirements of Madeley and Betley in the Local Plan. Madeley and Betley is located in the west of the Newcastle-under-Lyme Borough and has been identified as a rural centre in Policy PSD2.

J.11.2 Land North of Bar Hill, Madeley

Site reference	Site use	Indicative dwellings	Area (ha)
MD29	Residential-led	150	15.7

Land North of Bar Hill, Madeley

Land north of Bar Hill is allocated for residential development for around 150 dwellings. Development will be permitted subject to:-

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being taken via Bar Hill
3. Improvements to active travel links, including enhancement to the width and condition of the existing footbridge over the rail line
4. The layout and development of the site will be landscape led and buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area, including the area of open countryside on its western edge
5. A sequential approach being taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding
6. Proximity of Bar Hill Wood Ancient Woodland in near proximity (<500m) to the west of the site being recognised, & any impacts, mitigated.
7. Recognition of Tree Preservation Orders (TPO), including root networks
8. Submission of a noise assessment and mitigation strategy in relation to the impact of the A525 and West Coast Mainline railway line.
9. Preservation and enhancement of the existing Public Right of Way adjoining the site's western boundary
10. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council.
11. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
MD29	+/-	-	0	-	+	0	0	-	-	++	0	0

- J.11.2.1 Site MD29 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.11.2.2 The site is located in close proximity to the 'Bar Hill' ancient woodland which will have impacts identified and mitigated as a consequence of development. However, it is recommended that development is directed away from areas of the site comprise high habitat distinctiveness. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) has been identified.
- J.11.2.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.11.2.4 An HIA will be required to avoid adverse impacts on nearby heritage assets, including the Madeley Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.11.2.5 The layout and design of the site will be 'landscape led' including the preservation of mature trees to reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. The policy recognises tree preservation orders including their root networks to be factored into the design of the site. A noise assessment will also be required to minimise impacts from the A525 and West Coast Mainline railway. However, the site is situated within an area of 'moderate' sensitivity according to the LSCA. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.11.2.6 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. The site is still located away from NHS hospitals with A&E facilities. The PRoW adjoining the western boundary of the site will be preserved and enhanced, and improvements will be made to the pedestrian footbridge over the railway which connects the site to local amenities. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.
- J.11.2.7 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.12 Newchapel and Mow Cop

J.12.1.1 Site NC13 has been identified to contribute towards meeting the development requirements of Newchapel and Mow Cop in the Local Plan. Newchapel and Mow Cop is located in the north of the Newcastle-under-Lyme Borough and has been identified as an urban centre in Policy PSD2.

J.12.2 Land West of Bullockhouse Road, Harriseahead

Site reference	Site use	Indicative dwellings	Area (ha)
NC13	Residential-led	100	3.2

Land West of Bullockhouse Road, Harriseahead

Land west of Bullockhouse Road, Harriseahead is allocated for around 100 residential dwellings. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
2. Access to the development being via Bullocks House Road,
3. Improvements along the site frontage and contributions towards bus service improvements,
4. The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area.
5. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
6. Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity
7. The retention and enhancement of existing Public Rights of Way including (Kingsgrove 28)
8. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
NC13	+	0	-	++	+	0	0	-	-	+	-	0

J.12.2.1 Site NC13 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.12.2.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. Due to the location of the site away from BMV soil, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).

- J.12.2.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.12.2.4 The layout and design of the site will be 'landscape led' whilst ensuring development is not intrusive to views. This is likely to reduce significant impacts on the landscape. However, the site is situated within an area of 'medium' sensitivity with a 'moderate' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.12.2.5 It will be a requirement for the developer to provide financial contributions to local schools, health facilities and bus services. The PRow adjoining the site will also be retained and enhanced. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.
- J.12.2.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.13 Silverdale

- J.13.1.1 Sites SP2, SP11, SP22, SP23 and G&T Site 8 are identified to contribute towards meeting the development requirements of Silverdale in the Local Plan. Silverdale is located in the centre of the Newcastle-under-Lyme Borough and has been identified as a strategic centre in line with Policy PSD2.

J.13.2 Cheddar Drive, Silverdale

Site reference	Site use	Indicative dwellings	Area (ha)
SP2	Residential-led	Around 8	0.26

Cheddar Drive, Silverdale

Land at Cheddar Drive, Silverdale is allocated for around 8 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) This site would require demolition of 4 dwellings resulting in a net gain of 8.
- 3) Access to the development via Cheddar Drive
- 4) A coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity is required.
- 5) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SP2	+/-	0	0	++	+	0	0	+	-	++	-	0

- J.13.2.1 Site SP2 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.13.2.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. Due to the location of the site away from BMV soil, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).
- J.13.2.3 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. However, site assessments presented in **Appendix H** indicate poor access across indicators for health and transport and accessibility. On balance, owing to the site being located outside of the sustainable

distance to healthcare, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.

J.13.2.4 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.13.3 Lyme Park, Silverdale

Site reference	Site use	Indicative dwellings	Area (ha)
SP11 (1), SP11 (2), SP11 (3) and SP11 (4)	Residential-led	Around 36	25.55

Lyme Park, Silverdale

Land at Lyme Park, Silverdale is allocated for residential and community uses within a wider Country Park setting. Development is expected to be delivered as follows:

- SP11 (1) – Keele Square - a development of around 255 homes, a local centre (including a health centre) to meet local needs and a 1 form entry Primary School, including an attractive public realm accessed from a new spur from A525 Keele Road / University Avenue roundabout
- SP11 (2) – Keele Woods – a development of around 310 homes accessed from A525 Keele Road
- SP11 (3) – Ashbourne Drive – a development of around 235 homes accessed from Ashbourne Drive.
- SP11 (4) – Park Road – a development of around 100 homes accessed from a new road from the junction of Race Course and Park Road to the north east of the site
- The provision of a country park to include the retention of trees and maintenance of a high quality ecological and natural resource with appropriate walking and cycling routes through the site.

Development proposals will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Safe, appropriate and useable access routes and connectivity to different parcels within the larger allocation, particularly by non-car means being secured,
3. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Keele Hall Conservation Area, Keele Registered Park and Garden and nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
4. Improvements to enhance cycle and pedestrian connectivity to Silverdale, Keele University, public transport links and Newcastle-under-Lyme Town Centre. Development should also consider walking and active travel routes for health and wellbeing purposes within the wider site connecting to local transport routes,
5. Appropriate contributions to local bus infrastructure and the provision of routes to provide access for residents to the public transport network,
6. the preparation and agreement of a masterplan and design code prepared for the site which should be prepared in line with Policy SA1 (General Requirements):
 - a) Achieve high quality design, through design code(s) reflecting the landscape location of the site and its topography to create a vibrant destination. Development should be landscape-led and look to retain woodland and mature tree cover within the site. The design should also consider the shade effects of trees in the layout of development.
 - b) Provide appropriate ecological buffer(s) to Bogs Wood Site of Biological Interest (Local Wildlife Site) and Jobs Wood should be provided. Impacts on the Site of Biological Interest should be minimised through the provision of open space, additional planting and restriction of access into the Local Wildlife Site. This should also consider Redheath Plantation adjoining the site.

Lyme Park, Silverdale

- c) The Golf Course Driving Range is intended to be retained in its current location. Appropriate mitigation should be provided from the Driving Range and Cricket Ground (Ball Strike Assessment) to ensure appropriate buffers are created and impacts minimised.
7. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
8. Submission of a noise mitigation strategy in relation to the impact of noise from the A525 Keele Road, Keele Driving Range, Cricket Ground and other sensitive uses in and in close proximity to the site.
9. Submission of an odour assessment and potential mitigation given adjacent farm and industrial uses
10. Development should identify, retain and enhance areas of formal and informal open space within the site,
11. Submission of a land contamination assessment and mitigation strategy. This should recognise the importing of material to support the previous use on the site,
12. A coal mining risk assessment and mitigation strategy is required. This should also include a geotechnical assessment of the site and identify if any mitigation measures are required in respect of land stability, flooding and contamination remediation.
13. Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SP11 (1), SP11 (2), SP11 (3), SP11 (4)	+	-	0	-	+	0	0	-	0	++	+	0

- J.13.3.1 Sites SP11 (1), SP11 (2), SP11 (3) and SP11 (4) have been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.13.3.2 The policy requires woodland and mature tree cover to be retained, which will contribute towards the conservation of ecological networks. The policy requires an ecological buffer to be given to the 'Bogs Wood' SBI and Jobs Wood, whilst also considering the Redheath plantation adjacent to the site. A country park will improve biodiversity through the enhancement of woodland, grassland and existing ponds. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) will be expected.
- J.13.3.3 The site is situated on an area of previously undeveloped land including BMV soil, however the retaining of woodland and allocation of a country park is likely to minimise soil loss. A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. This will involve conducting a geotechnical assessment of land stability and contamination remediation. However, due

to the potential for BMV soil loss, a minor negative has been identified for natural resources (SA Objective 4).

- J.13.3.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A geotechnical assessment of land will consider flooding, and the supporting information indicates flood mitigations will be in place for the presence of surface water flooding from the nearby Springpool Spring. A minor positive impact is identified for flooding (SA Objective 5).
- J.13.3.5 An HIA will be required to avoid adverse impacts on nearby heritage assets, including the Keele Hall Conservation Area and Keele Registered Park and Garden. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.13.3.6 The layout and design of the site will be 'landscape led' in order to reduce the likelihood of significant impacts on the landscape, including the retaining of woodland as a landscape buffer whilst considering the shade effects of trees within the site. A country park will break up urban form through retaining ecological networks. Additionally, the policy also proposes mitigations in the form of buffers around the Golf Course Driving Range, minimising landscape impacts in the southern area of the site. A noise assessment and mitigation is also required. However, the site is situated within an area of 'high' sensitivity and has a 'moderate' overall contribution to the purposes of the Green Belt, according to the LSCA and Green Belt Assessment. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.13.3.7 Sustainable access to public transport will be provided through improving bus networks, cycling and pedestrian provision to surrounding towns, which is likely to improve access to secondary schools and railway stations. According to the supporting information, two PRoW networks intersecting the site will be retained, and the provision of a country park will create further pedestrian connectivity and open space which is likely to support health and wellbeing. It will be a requirement for land to be provided for a new primary school to be built within the site to improve educational access, however it is recommended that the site policy defines the size of the required land. The developer will also be expected to provide financial contributions to local schools and health facilities, although the site is still located away from GP surgeries and leisure facilities. A new local centre will provide retail provision, and an odour assessment with potential mitigations will also be required. A negligible impact is expected for health and wellbeing (SA Objective 9), and a minor positive impact is expected for transport and accessibility (SA Objective 11).
- J.13.3.8 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.13.4 Former Playground off Ash Grove, Silverdale

Site reference	Site use	Indicative dwellings	Area (ha)
SP22	Residential-led	Around 36	0.7

Former Playground off Ash Grove, Silverdale

Land at former Playground off Ash Grove Silverdale is allocated for residential development of around 36 dwellings. Development will be permitted subject to:

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA 1 (General Requirements)
- 2) This site would require demolition of 15 existing dwellings resulting in a net gain of 36.
- 3) Access to the development via St Lukes Close subject to widening works to the access road and off-site footway improvements on Station Road.
- 4) A Heritage Impact Assessment is required to demonstrate how the layout and design of the development will respond sensitively to the setting of Silverdale Conservation Area and nearby heritage assets giving consideration to the HIA for the site prepared by the Council.
- 5) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 6) A land contamination assessment and mitigation strategy is required.
- 7) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SP22	+/-	0	0	++	+	0	0	+	0	++	-	0

- J.13.4.1 Site SP22 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.13.4.2 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution. Due to the location of the site away from BMV soil, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).
- J.13.4.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.13.4.4 An HIA will be required to avoid adverse impacts on nearby heritage assets, including the Silverdale Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.13.4.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. However, site assessments presented in **Appendix H** indicate poor access across indicators for transport and accessibility. On balance, health (SA Objective 9) will be expected to have a negligible impact, and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.

J.13.4.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.13.5 Land at Cemetery Road/Park Road

Site reference	Site use	Indicative dwellings	Area (ha)
SP23	Residential-led	Around 200	5.2

Land at Cemetery Road/Park Road

Land at Cemetery Road is allocated for around 200 residential dwellings. Development will be permitted subject to

1. Satisfactorily addressing the site requirements set out in Policy SA1 (General Requirements),
2. No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026,
3. Access to the development to be via Cemetery Road,
4. Offsite improvements will be required to enhance cycle and pedestrian connectivity to Silverdale, Keele University and Newcastle-under-Lyme Town Centre,
5. The direct provision of cycle and pedestrian routes from Cemetery Road to A525 Keele Road, including the retention and enhancement of Public Rights of Way (Silverdale 23),
6. Masterplanning of the site to consider appropriate linkages into SP11 (4) Park Road to ensure co-ordination across the two sites. The masterplan should also provide for appropriate boundary treatment with the Green Belt. The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
7. Submission of a land contamination assessment, odour assessment and associated mitigation strategy, including in relation to the impact of Walleys Quarry,
8. Submission of noise assessment and mitigation strategy in relation to impact of Cemetery Road and adjacent industrial uses,
9. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
10. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
SP23	+	-	--	-	+	0	0	-	-	++	0	0

J.13.5.1 Site SP23 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.13.5.2 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution, particularly with regard to Walleys Quarry. However, the site coincides with BMV soil, therefore a minor negative impact will be expected for natural resources (SA Objective 4).

- J.13.5.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.13.5.4 The layout and design of the site will be 'landscape led' whilst ensuring development is not intrusive to views. "Appropriate boundary treatments" will be required to provide a Green Belt buffer, although the policy may benefit from stronger wording to define the word "appropriate". A noise assessment and mitigation strategy will also be required. However, the site is situated within an area of 'high' sensitivity with a 'moderate' overall contribution to the purposes of the Green Belt, according to the LSCA and Green Belt assessment. A minor negative impact is expected on landscape (SA Objective 8).
- J.13.5.5 It will be a requirement for the developer to provide financial contributions to local schools, health facilities and bus services. According to the supporting information, the PRoW in close proximity to the site will also be retained and enhanced, including links to the wider GI network. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. On balance, health (SA Objective 9) will be expected to have a minor negative impact as the site is located away from GP surgeries, and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.13.5.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.13.6 Land West of Silverdale Business Park

Site reference	Site use	Indicative dwellings	Area (ha)
G&T8	Residential-led	N/A	2.6

Land West of Silverdale Business Park

The land at land west of Silverdale Business Park, Silverdale, as shown on the Policies Map is allocated for 5 Gypsy and Traveller Pitches, subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Retaining existing boundary treatments to the site
- 3) Use of permeable materials as replacement hardstanding, where required, and provide a drainage strategy to manage surface run-off from the site.
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 5) Provision of appropriate visibility splay and access arrangements from Park Road.
- 6) Submission of a noise assessment and mitigation strategy in relation to the impact of the adjacent business park.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
G&T8	+/-	-	0	+	0	0	0	+	-	++	++	0

- J.13.6.1 Site G&T8 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.13.6.2 The site will be replaced with permeable materials in order facilitate improved surface water drainage and runoff from the site. Additionally, areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A negligible impact is identified for flooding (SA Objective 5).
- J.13.6.3 A noise assessment and mitigation strategy will be required to mitigate potential impacts from the adjacent business park. A minor positive impact on landscape (SA Objective 8) will be expected.
- J.13.6.4 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14 Talke and Butt Lane

J.14.1.1 Site BL8, BL18, BL32, TK6, TK10, TK17 and TK27 are identified to contribute towards meeting the development requirements of Talke and Butt Lane in the Local Plan. Talke and Butt Lane is located in the north of the Newcastle-under-Lyme Borough and has been identified as an urban centre in Policy PSD2.

J.14.2 Land adjacent to roundabout at West Avenue, Kidsgrove

Site reference	Site use	Indicative dwellings	Area (ha)
BL8	Residential-led	Around 40	1.42

Land adjacent to roundabout at West Avenue, Kidsgrove

Land adjacent to roundabout at West Avenue, Kidsgrove is allocated for residential development of around 40 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via West Avenue.
- 3) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 4) A coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity is required. A land contamination assessment and mitigation strategy is required
- 5) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
BL8	+/-	0	0	+	+	0	0	+	0	++	0	+

J.14.2.1 Site BL8 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.14.2.2 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution. A minor positive impact will be expected for natural resources (SA Objective 4).

J.14.2.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).

J.14.2.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities,

proposed improvements to accessibility are minimal. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

- J.14.2.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14.3 Land at Clough Hall

Site reference	Site use	Indicative dwellings	Area (ha)
BL18	Residential-led	Around 150	13.45

Land at Clough Hall

Land at Clough Hall is allocated for residential development for around 150 dwellings. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being via A34 Newcastle Road
3. The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
4. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
5. An appropriate ecological buffer to Bathpool Park Site of Biological Interest (Local Wildlife Site) located along the south western edge of the site should be provided. Impacts on the Site of Biological Interest should be minimised through the provision of open space, additional planting and restriction of access into the Local Wildlife Site.
6. Submission of a noise assessment and mitigation strategy in relation to the impact of noise from the A34 Newcastle Road and adjacent anticipated uses including the playing fields,
7. Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity.
8. The retention and improvement of two playing pitches, with appropriate ancillary facilities for football use.
9. In line with Policy SA1 (General Requirements), a masterplan to be prepared for the site which will
 - a) consider cycle and pedestrian connectivity to the A34 and wider environs including the enhancement and connection into existing Public Rights of Way, and
 - b) retain and enhance Trees, particularly those subject to Tree Preservation Orders.
10. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
BL18	0	-	0	+	+	0	0	-	-	0	++	0

- J.14.3.1 Site BL18 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.14.3.2 *"Appropriate ecological buffers"* will be used to mitigate potential impacts on the 'Bathpool Park' SBI, which should involve utilising open space, restriction of access and additional planting around the SBI. Trees within the site will also be retained and enhanced. Subject to no significant effects being identified with the HRA, a negligible impact is expected for biodiversity (SA Objective 3).
- J.14.3.3 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution, and a coal mining assessment and mitigation strategy will be required in order to account for former mining activity. A minor positive impact will be expected for natural resources (SA Objective 4).
- J.14.3.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.14.3.5 The layout and design of the site will be 'landscape led' in order to reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. A noise assessment and mitigation strategy regarding potential impacts from the A34 and adjacent playing fields will also be required, and trees are expected to be retained and enhanced including those with Tree Preservation Orders. However, the site is situated within an area of 'medium' sensitivity according to the LSCA. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.14.3.6 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Two playing pitches within the site are expected to be retained alongside facilities for football use. Pedestrian and cycle connections to the A34 will be considered, and improvements will also be made to nearby PRoW. However, the site is still located away from an NHS hospital with A&E services. On balance a minor negative impact has been identified for health (SA Objective 9) and a major positive impact is expected for transport (SA Objective 11).
- J.14.3.7 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14.4 Land at Congleton Road, Butt Lane

Site reference	Site use	Indicative dwellings	Area (ha)
BL32	Residential-led	Around 20	0.85

Land at Congleton Road, Butt Lane

Land at Congleton Road, Butt Lane is allocated for residential development of around 20 dwellings. Development will be permitted subject to

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Knowles View.

Land at Congleton Road, Butt Lane

- 3) Off-site highway works required within Knowles Way to provide a suitable means of access into the site.
- 4) Pedestrian connection to be provided between Knowles View and A34 Congleton Road (including enhancement of existing Public Right of Way).
- 5) A coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity is required.
- 6) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
BL32	+/-	-	-	+	+	0	0	+	-	+	++	+

J.14.4.1 Site BL32 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.14.4.2 A land contamination assessment and mitigation strategy will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. A minor positive impact will be expected for natural resources (SA Objective 4).

J.14.4.3 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

J.14.4.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The PRoW adjoining the site will be enhanced for improved pedestrian connectivity between Knowles View and the A34. However, the site is still located away from an NHS hospital with A&E services. On balance a minor negative impact has been identified for health (SA Objective 9) and a major positive impact is expected for transport (SA Objective 11).

J.14.4.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14.5 Site at Coalpit Hill, Talke

Site reference	Site use	Indicative dwellings	Area (ha)
TK6	Residential-led	Around 10	0.46

Site at Coalpit Hill, Talke

Land at Coalpit Hill Talke is allocated for residential development for around 10 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Red Lion Close.
- 3) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the setting of Talke Conservation Area and nearby heritage assets giving consideration to the HIA for the site prepared by the Council.
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 5) A coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity is required.
- 6) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TK6	0	0	0	+	+	0	0	-	-	++	0	0

- J.14.5.1 Site TK6 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.14.5.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. Overall, a minor positive impact will be expected for natural resources (SA Objective 4).
- J.14.5.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.14.5.4 A HIA will be required to avoid adverse impacts on nearby heritage assets including the Talke Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.14.5.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The PRoW adjoining the site will be enhanced for improved pedestrian connectivity between Knowles View and the A34. However, the site is still located away from an NHS hospital with A&E services. On balance a minor negative impact has been identified for health (SA Objective 9) and a negligible impact is expected for transport (SA Objective 11).
- J.14.5.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14.6 Land at Crown Bank, Talke, Talke and Butt Lane

Site reference	Site use	Indicative dwellings	Area (ha)
TK10	Residential-led	Around 170	5.33

Land at Crown Bank, Talke, Talke and Butt Lane

Land at Crown Bank, Talke, Talke and Butt Lane is allocated for residential development for around 170 dwellings. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development via Pit Lane,
3. The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
4. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Talke Conservation Area and nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
5. Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity
6. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
7. Submission of a noise assessment and mitigation strategy in relation to the impact of noise from the adjacent industrial estate,
8. The enhancement of the Public Rights of Way and Green Infrastructure Network.
9. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TK10	+	0	-	-	+	0	0	-	-	+	0	0

- J.14.6.1 Site TK10 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.14.6.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. However, the site is located within an area of previously undeveloped land. Overall, a minor negative impact will be expected for natural resources (SA Objective 4).
- J.14.6.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).

- J.14.6.4 A HIA will be required to avoid adverse impacts on nearby heritage assets including the Talke Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.14.6.5 The layout and design of the site will be 'landscape led' in order to reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. A noise assessment and mitigation strategy regarding potential impacts from the adjacent industrial estate, and fragmentation will be provided to urban form through GI provision. However, the site is situated within an area of 'medium' sensitivity with a 'strong' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.14.6.6 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. According to the supporting information, the PRoW adjacent to the site will also be retained and enhanced, including links to the wider GI network. However, the site is still located away from an NHS hospital with A&E services. On balance a minor negative impact has been identified for health (SA Objective 9) and a negligible impact is expected for transport (SA Objective 11).
- J.14.6.7 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14.7 Land off St Martins Road, Talke

Site reference	Site use	Indicative dwellings	Area (ha)
TK17	Residential-led	Around 40	1.24

Land off St Martins Road, Talke

Land off St Martins Road, Talke is allocated for residential development for around 40 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via St Martins Road.
- 3) The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area.
- 4) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the setting of nearby heritage assets including Harecastle Farmhouse Grade II listed building giving consideration to the HIA for the site prepared by the Council.
- 5) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 6) Coal mining risk assessment and mitigation strategy required.
- 7) Contaminated land assessment and mitigation strategy required in relation to area of former mining activity and impact of former landfill site to the south at Talke Road.
- 8) Noise impact assessment and mitigation strategy required in relation to the impact of the A34 and A500.
- 9) Enhancements required to existing pedestrian/ cycleway link from site to A53 cycle route to be provided. A53 pedestrian / cycle crossing facilities to be provided and fully funded by applicant.

Land off St Martins Road, Talke

- 10) Sewers pass through the site including potential risk of sewer flooding which will need to be taken into consideration.
- 11) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TK17	+	-	-	++	+	0	0	-	-	++	0	0

- J.14.7.1 Site TK17 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.14.7.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. A major positive impact will be expected for natural resources (SA Objective 4).
- J.14.7.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.14.7.4 A HIA will be required to avoid adverse impacts on nearby heritage assets including the Harecastle Farmhouse Grade II Listed Building. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.14.7.5 The layout and design of the site will be 'landscape led' in order to reduce the likelihood for significant impacts on the landscape, whilst ensuring development is not intrusive to views. A noise impact assessment and mitigation strategy will also be required. However, the site is situated within an area of 'medium' sensitivity according to the LSCA. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.14.7.6 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Pedestrian and cycle links to the A53 will be enhanced, however the site is still located outside of a sustainable distance from secondary schools and the site is also located away from an NHS hospital with A&E services. Overall, a minor negative impact has been identified for health (SA Objective 9) and a negligible impact is expected for transport (SA Objective 11).
- J.14.7.7 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.14.8 Land off Coppice Road, Talke

Site reference	Site use	Indicative dwellings	Area (ha)
TK27	Residential-led	Around 90	2.83

Land off Coppice, Talke

Land off Coppice Road, Talke is allocated for residential development for around 90 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Coppice Road.
- 3) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the setting of Talke Conservation Area and nearby heritage assets including Church of St Martin Grade II listed building giving consideration to the HIA prepared by the Council.,
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.
- 5) A coal mining risk assessment, land contamination assessment and mitigation strategy in relation to area of former mining activity is required.
- 6) Improvements required at Coppice Road / Merelake Road / Coal Pit Lane junction for highway safety reasons. Offsite footway improvements required on the site frontage and from the site to local school, bus stops and shops.
- 7) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TK27	+	0	-	-	+	0	0	-	-	+	0	0

- J.14.8.1 Site TK27 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.14.8.2 A land contamination assessment will be required in order to take account of potential ground pollution, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. However, the site is situated upon an area of BMV soil. Overall, a minor negative impact will be expected for natural resources (SA Objective 4).
- J.14.8.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.14.8.4 A HIA will be required to avoid adverse impacts on nearby heritage assets including the Talke Conservation Area and the Church of St Martin Grade II Listed Building. The HIA will be implemented through the layout and design of development in order to respond

sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).

- J.14.8.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Pedestrian footpaths will be improved for safety and improved to connectivity to schools, bus stops and shops. However, the site is still located away from an NHS hospital with A&E services. On balance a minor negative impact has been identified for health (SA Objective 9) and a negligible impact is expected for transport (SA Objective 11).
- J.14.8.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.15 Thistleberry

- J.15.1.1 Sites TB6, TB19 and TB23 are identified to contribute towards meeting the development requirements of Thistleberry in the Local Plan. Thistleberry is located in the east of the Newcastle-under-Lyme Borough and has been identified as a strategic centre with Policy PSD2.

J.15.2 Former Pool Dam Pub Site, Orme Road, Poolfields, Newcastle

Site reference	Site use	Indicative dwellings	Area (ha)
TB6	Residential-led	Around 13	0.34

Former Pool Dam Pub Site, Orme Road, Poolfields, Newcastle

Land at Former Pool Dam Pub site, Orme Road is allocated for residential development for around 13 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Wain Avenue and Orme Road
- 3) Geo-environmental survey required in relation to faulting local area and concerns about unknown fill / presence of contaminants,
- 4) Odour assessment required in relation to impact of Walleys Quarry Landfill Site to the west. Occupation of residential development after cessation in operation of Walleys Quarry Landfill site.
- 5) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TB6	+/-	-	+	-	+	0	0	+	0	++	0	0

- J.15.2.1 Site TB6 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.15.2.2 A geo-environmental survey will be required in order to take account of potential ground pollution and faulting in the area. However, the site is situated within an area of BMV soil. Overall, a minor negative impact will be expected for natural resources (SA Objective 4).
- J.15.2.3 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

J.15.2.4 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.15.3 Land South of Newcastle Golf Club, Thistleberry

Site reference	Site use	Indicative dwellings	Area (ha)
TB19	Residential-led	Around 550	45.44

Land South of Newcastle Golf Club, Thistleberry

Land South of Newcastle Golf Club, Thistleberry is allocated for residential development for around 550 dwellings. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being via the A53 Whitmore Road,
3. The layout and development of the site will be landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area,
4. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Keele Hall Conservation Area, Keele Registered Park and Garden and nearby heritage assets, giving consideration to the HIA for the site prepared by the Council,
5. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
6. Appropriate ecological buffers to Pie Rough, Hands Wood and Barkers Wood Biodiversity Alert Areas and Springpool Wood Site of Biological Importance,
7. Submission of a noise assessment and mitigation strategy in relation to the impact of noise from the M6 Motorway and A53 Whitmore Road,
8. Provision of strategic open space to the south-west of the site adjacent to the M6 Motorway in accordance with an agreed masterplan, noise mitigation strategy and ecological mitigation strategy,
9. Submission of geo-environmental survey in relation to applications for fracking in the area,
10. The safeguarding of land for the provision of a link road to Keele University and enhancement of existing Public Rights of Way and Green Infrastructure.
11. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TB19	+	-	0	--	+	+	0	-	-	++	-	++

J.15.3.1 Site TB19 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.15.3.2 "*Appropriate ecological buffers*" will be used to mitigate potential impacts on the 'Pie Rough', 'Hands Wood' and 'Barkers Wood' BAS and the 'Springpool Wood' SBI, although the policy may benefit from stronger wording to define the word "*appropriate*". An

ecological mitigation strategy will also be implemented, alongside GI provision and alternative recreational provision. Subject to no significant effects being identified with the HRA, a negligible impact on biodiversity (SA Objective 3) has been identified.

- J.15.3.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.15.3.4 According to the supporting information, a water drainage strategy will be implemented to avoid adverse impacts on the watercourse which connects to the King's and Hargreaves Woods SSSI. A minor positive impact is expected for water (SA Objective 6).
- J.15.3.5 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Keele Hall Conservation Area, Keele Hall Grade II Listed Building, and the Keele Hall Registered Park and Garden. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.15.3.6 The layout and design of the site will be 'landscape led' whilst ensuring development is not intrusive to views. A noise assessment and mitigation strategy will also be implemented to avoid adverse impacts from the M6 and the A53, and fragmentation to urban form will be provided through GI provision and according to the supporting information, open space to the south west of the site. However, the site is situated within an area of 'high' sensitivity with a 'moderate' overall contribution to the purposes of the Green Belt, according to the LSCA and Green Belt study. A minor negative impact is identified overall for landscape (SA Objective 8).
- J.15.3.7 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Land will be safeguarded to provide a link road to Keele University, and the PRoW adjoining the site will be retained and enhanced. According to the supporting information, pedestrian and cycle links and open space provision will also be established and improved, and a new school is proposed within a nearby site. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal and the provision of a school is contingent upon another site. On balance, health (SA Objective 9) and transport and accessibility (SA Objective 11) will be expected to have a minor negative impact.
- J.15.3.8 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.15.4 Land West of Galingale View, Thistleberry

Site reference	Site use	Indicative dwellings	Area (ha)
TB23	Residential-led	Around 124	4.37

Land West of Galingale View, Thistleberry

Land West of Galingale, Thistleberry is allocated for residential development for around 124 dwellings. Development will be permitted subject to:

Land West of Galingale View, Thistleberry

1. Satisfactorily addressing the allocation requirements set out in Policy SA1 (General Requirements),
2. Primary access to the development via Galingale View, secondary access via Rosemary Hi and Barnacle Place,
3. Submission of a coal mining risk assessment, mitigation strategy and development to be located outside the coal mining development high risk zone,
4. Submission of a land contamination assessment, odour assessment and associated mitigation strategy in relation to the impact of Walleys Quarry,
5. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
6. The enhancement of the existing Public Rights of Way and Green Infrastructure Network.
7. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TB23	+/-	-	-	-	0	0	0	+	-	+	0	0

- J.15.4.1 Site TB23 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.15.4.2 A land contamination assessment will be required in order to take account of potential ground pollution from Walleys Quarry, and coal mining assessment and mitigation strategy will be required to account for impacts related to previous mining use. However, the site is located in an area of BMV soil. Overall, a minor negative impact will be expected for natural resources (SA Objective 4).
- J.15.4.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A negligible impact is identified for flooding (SA Objective 5).
- J.15.4.4 According to the supporting information, the landscaping strategy will ensure consideration is given to the adjacent Protection of Green Heritage Network designation, including the retaining of trees along the eastern and western site boundaries. Fragmentation will also be provided to urban form through GI provision. A minor positive impact is expected for landscape (SA Objective 8).
- J.15.4.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The PRoW located in close proximity will be retained and enhanced, alongside GI provision. Although this has potential to increase the capacity for these facilities, proposed improvements to accessibility are minimal, and the site is still located away from GP surgeries, leisure centres and railway stations. However, the site is located in close proximity to sustainable and active modes of travel including bus routes. On balance, health (SA Objective 9) is expected to have a minor negative impact and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

- J.15.4.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16 Town

J.16.1.1 Sites TC7, TC19, TC20, TC22, TC40, TC45, TC50, TC52, TC71 are identified to contribute towards meeting the development requirements of the Town area in the Local Plan. The Town ward is located in the west of the Newcastle-under-Lyme Borough and has been identified as a strategic centre with Policy PSD2.

J.16.2 Land bound by Ryecroft, Ryebank , Merrial Street, Corporation Street and Liverpool Road, Newcastle

Site reference	Site use	Indicative Dwellings	Employment Land (ha)	Area (ha)
TC7	Residential-led	Around 75	1.63	1.92

Land bound by Ryecroft, Ryebank, Merrial Street, Corporation Street and Liverpool Road, Newcastle

Land at Ryecroft is allocated for residential and commercial uses of around 75 dwellings and 1.63 hectares of gross employment land. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Corporation Street and Ryecroft
- 3) Contaminated land assessment and mitigation strategy required,
- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 5) Heritage Impact Assessment required demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
- 6) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
- 7) Noise assessment and mitigation strategy required in relation to nearby commercial uses and impact of road noise from A34, A52, A53,
- 8) Off-site footway/cycleway infrastructure improvements required along Corporation Street to enhance sustainable travel links in accordance with LCWIP,
- 9) Direct pedestrian/cycle route between A52 Ryecroft Toucan Crossing and Merrial Street/ Corporation Street to be secured by the internal layout to improve connectivity to the town centre.
- 10) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC7	0	-	0	++	+	0	0	+	++	+	0	+

J.16.2.1 Site TC7 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

- J.16.2.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located adjacent to the A52. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.2.3 A land contamination assessment will be required in order to take account of potential ground pollution. Due to the location of the site on previously developed land, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).
- J.16.2.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.16.2.5 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Newcastle Town Centre Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.2.6 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is located in close proximity to sustainable and active modes of travel including bus routes, and the proposals include improved pedestrian and cycling infrastructure to enhance sustainable travel links in and around the town centre. A GP surgery and leisure centre is also located within 200m of the site. On balance, health (SA Objective 9) is expected to have a major positive impact and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.16.2.7 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.3 Hassell Street Car Park

Site reference	Site use	Indicative Dwellings	Area (ha)
TC19	Residential-led	5	0.11

Hassell Street Car Park

Land at Hassell Street Car Park is allocated for residential development for 5 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Hassell Street
- 3) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
- 4) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area
- 5) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC19	+/-	-	0	++	+	0	0	+	++	+	0	0

J.16.3.1 Site TC19 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

J.16.3.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located in close proximity to the A53 and the A527. A minor negative impact on air (SA Objective 2) is identified overall.

J.16.3.3 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Newcastle Town Centre Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).

J.16.3.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although the site is located away from railway stations, it is located in close proximity to other sustainable and active modes of travel including bus routes which may improve access to the railway station. A GP surgery is also located with 200m of the site, and the site has access to a variety of greenspaces and other health facilities. On balance, health (SA Objective 9) will be expected to have a major positive impact, and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

J.16.3.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.4 King Street Car Park

Site reference	Site use	Indicative Dwellings	Area (ha)
TC20	Residential-led	10	0.34

King Street Car Park

Land at King Street Car Park is allocated for residential development for around 10 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Kings Street
- 3) Contaminated land assessment and mitigation strategy required in relation to former landfill use,
- 4) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council,

King Street Car Park

- 5) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
- 6) Noise assessment and mitigation strategy required in relation to nearby commercial uses and impact of road noise from A52 and A53.
- 7) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC20	+/-	-	+	++	+	0	0	+	++	+	0	0

- J.16.4.1 Site TC20 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.16.4.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located in close proximity to the A52 and the A53. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.4.3 A land contamination assessment will be required in order to take account of potential ground pollution. Due to the location of the site on previously developed land, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).
- J.16.4.4 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.16.4.5 A HIA will be required to avoid adverse impacts on nearby heritage assets including the Newcastle Town Centre Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.4.6 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. Although the site is located away from railway stations, it is located in close proximity to other sustainable and active modes of travel including bus routes which may improve access to the railway station. Health facilities such as GP surgeries, leisure centres and greenspaces are also located in close proximity to the site. On balance, health (SA Objective 9) will be expected to have a major positive impact, and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.16.4.7 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.5 Marsh Parade, Newcastle (former Zanzibar night club)

Site reference	Site use	Indicative dwellings	Area (ha)
TC22	Residential-led	Around 70	0.35

Marsh Parade, Newcastle (former Zanzibar night club)

Land at Marsh Parade is allocated for residential development for around 70 dwellings and commercial units. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via North Street / Hassell Street
- 3) Land contamination assessment and mitigation strategy required associated with former land use,
- 4) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
- 5) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
- 6) Noise and odour assessment and mitigation strategy required in relation to nearby commercial uses and impact of A53 and A52.
- 7) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC22	+/-	-	0	++	+	0	0	+	++	+	0	+

- J.16.5.1 Site TC22 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.16.5.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located adjacent to the A52. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.5.3 A land contamination assessment will be required in order to take account of potential ground pollution. Due to the location of the site on previously developed land, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).
- J.16.5.4 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Talke Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.5.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The PRoW located in close proximity will be retained and enhanced,

alongside improved GI provision. Although the site is located away from railway stations, it is located in close proximity to other sustainable and active modes of travel including bus routes which may improve access to the railway station. Health facilities such as GP surgeries, leisure centres and greenspaces are also located in close proximity to the site. On balance, health (SA Objective 9) will be expected to have a major positive impact, and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

- J.16.5.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.6 Car Park, Blackfriars Road, Newcastle

Site reference	Site use	Indicative dwellings	Employment Land (ha)	Area (ha)
TC40	Residential-led	Around 10	0.19	0.2

Car Park, Blackfriars Road, Newcastle

Land at the car park, Blackfriars Road is allocated for residential development of around 10 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Blackfriars Road
- 3) Land contamination assessment and mitigation strategy required including in relation to potential impact on Lyme Brook,
- 4) Heritage Impact Assessment required demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets including Old Orme Boys School Grade II Listed building giving consideration to the HIA for the site prepared by the Council,
- 5) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 6) Noise assessment and mitigation strategy required in relation to nearby commercial uses and impact of road noise from A53 and A525.
- 7) Improvement in footway access to the tow path required (step free).
- 8) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC40	+/-	-	0	++	+	0	0	+	++	0	0	0

- J.16.6.1 Site TC40 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.

- J.16.6.2 A land contamination assessment will be required in order to take account of potential ground pollution. Due to the location of the site on previously developed land, as well as the nearby location of a waste management facility, a major positive impact will be expected for natural resources (SA Objective 4).

- J.16.6.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.16.6.4 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Old Orme Boys School Grade II Listed Building. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.6.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is located outside of a sustainable distance to railway stations, however this has potential to be mitigated as it is located in close proximity to frequent bus routes. GP surgeries are also located within 200m of the site, and there is access to a variety of greenspaces. On balance, health (SA Objective 9) is expected to have a major positive impact and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.16.6.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.7 York Place, Newcastle Town Centre

Site reference	Site use	Employment Land (ha)	Area (ha)
TC45	Residential-led	0.29	0.29

York Place, Newcastle Town Centre

Land at York Place is allocated for commercial uses. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Merrial Street
- 3) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council,
- 4) Delivery/ Service Management Strategy required to support development to permit off-peak loading / unloading on Merrial Street,
- 5) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
- 6) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC45	+/-	-	0	++	+	0	0	+	++	+	0	0

- J.16.7.1 Site TC45 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in Appendix D of the Regulation 18 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.16.7.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located in close proximity to the A52. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.7.3 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Newcastle Town Centre Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.7.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is located outside of a sustainable distance to railway stations, however this has potential to be mitigated as it is located in close proximity to frequent bus routes. Leisure centres are located within 400m of the site and the site lies in close proximity to other health facilities including and NHS hospital with A&E services, and GP surgeries. Health (SA Objective 9) is expected to have a major positive impact and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.16.7.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.8 Cherry Orchard Car Park

Site reference	Site use	Indicative Dwellings	Area (ha)
TC50	Residential-led	5	0.07

Cherry Orchard Car Park

Land at Cherry Orchard Car Park is allocated for residential development for around 5 dwellings. Development will be permitted subject to

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Cherry Orchard
- 3) Heritage Impact Assessment required demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets including Ebenezer House and St George's Church Grade II Listed buildings giving consideration to the HIA for the site prepared by the Council,
- 4) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
- 5) Noise assessment and mitigation strategy required in relation to the impact of the A52, A527 and A53.
- 6) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC50	+/-	-	+	++	+	0	0	+	++	+	-	0

- J.16.8.1 Site TC50 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.16.8.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located adjacent to the A52. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.8.3 A HIA will be required to avoid adverse impacts on nearby heritage assets including Ebenezer House and St George's Church Grade II Listed Buildings. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.8.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is located in close proximity to leisure facilities and greenspaces, as well as other health facilities. Railway stations are located outside of a sustainable distance from the site, however there is potential for this to be mitigated as it is located in close proximity to frequent bus routes. On balance, health (SA Objective 9) is expected to have a major positive impact and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.16.8.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.9 Goose Street Car Park

Site reference	Site use	Indicative Dwellings	Area (ha)
TC52	Residential-led	25	0.35

Goose Street Car Park

Land at Goose Street Car Park is allocated for residential development for around 25 dwellings. Development will be permitted subject to:-

- 1) Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements)
- 2) Access to the development via Goose Street
- 3) Heritage Impact Assessment required to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets including the Holy Trinity RC Church and The Barracks Workshops Grade II Listed Buildings giving consideration to the HIA for the site prepared by the Council,

Goose Street Car Park

- 4) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding,
- 5) Air quality assessment and mitigation strategy required in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
- 6) Noise assessment and mitigation strategy required in relation to the impact of the A34 and A527.
- 7) Financial contributions to improvements in the capacity of local schools and health facilities.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC52	+/-	-	0	++	+	0	0	+	++	++	0	0

- J.16.9.1 Site TC52 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.16.9.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located in close proximity to the A53, A54 and the A527. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.9.3 Areas with the lowest risk of flooding will be prioritised for development in order to direct development away from areas of high flood risk. A minor positive impact is identified for flooding (SA Objective 5).
- J.16.9.4 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Holy Trinity Church and The Barracks Workshops Grade II Listed Buildings. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.9.5 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is located outside of a sustainable distance to railway stations, however has potential to be mitigated as it is located in close proximity to frequent bus routes. Greenspaces and other health facilities, including and NHS hospital with A&E services and GP surgeries, are also located in close proximity to the site. On balance, health (SA Objective 9) is expected to have a major positive impact and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.
- J.16.9.6 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

J.16.10 Midway Car Park, Newcastle-under-Lyme Town Centre

Site reference	Site use	Indicative Dwellings	Area (ha)
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TC71	Residential-led	100	0.33
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Midway Car Park, Newcastle-under-Lyme Town Centre

Land at Midway Car Park Newcastle-Under-Lyme town centre is allocated for residential development for around 100 dwellings. Development will be permitted subject to:

1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
2. Access to the development being via Lower Street and The Midway,
3. Submission of a Heritage Impact Assessment demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets in Newcastle-under-Lyme town centre giving consideration to the HIA for the site prepared by the Council,
4. Submission of an air quality assessment and mitigation strategy in relation to the Newcastle-under-Lyme Town Air Quality Management Area,
5. Submission of a noise assessment and mitigation strategy in relation to the impact of the A53 and A525.
6. Financial contributions to improvements in the capacity of local schools and health facilities

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Policy Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
TC71	+/-	-	0	++	+	0	0	+	++	+	0	0

- J.16.10.1 Site TC71 has been assessed as a reasonable alternative with the full pre-mitigation assessment presented in **Appendix F** of the Regulation 19 SA Report, and the post-mitigation assessment presented in **Appendix H** of this report.
- J.16.10.2 The policy requires an air quality assessment and mitigation strategy to be implemented, in order to avoid adverse impacts related to the Newcastle-under-Lyme AQMA. However, the site is located in close proximity to the A525 and the A53. A minor negative impact on air (SA Objective 2) is identified overall.
- J.16.10.3 An HIA will be required to avoid adverse impacts on nearby heritage assets including the Newcastle Town Centre Conservation Area. The HIA will be implemented through the layout and design of development in order to respond sensitively to these assets. A negligible impact will be expected for cultural heritage (SA Objective 7).
- J.16.10.4 It will be a requirement for the developer to provide financial contributions to local schools and health facilities. The site is located outside of a sustainable distance to railway stations; however has potential to be mitigated as it is located in close proximity to frequent bus routes. Greenspaces and other health facilities, including an NHS hospital with A&E services and GP surgeries, are also located in close proximity to the site. On balance, health (SA Objective 9) is expected to have a major positive impact, and transport and accessibility (SA Objective 11) will be expected to have a negligible impact.

- J.16.10.5 The assessments against the remaining SA objectives are unchanged from the post-mitigation site assessments.

Appendix K: Equality Impact Assessment (EqIA)

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K.1 Introduction

K.1.1 Overview

K.1.1.1 The aim of the Equality Act (2010)¹ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and do all they can to promote equality.

K.1.1.2 The completion of EqIAs is a legal requirement under race, disability and gender equality legislation. EqIA is a systematic and evidence-based tool, which enables Newcastle-under-Lyme Borough Council (NuLBC) to consider the likely impacts of the Plan on different groups of people who share a protected characteristic, identified in the Equality Act. Protected characteristics comprise:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race; religion or belief; and
- Sexual orientation.

¹ Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 19/06/24]

K.2 Methodology

K.2.1 Summary methodology

K.2.1.1 Each policy of the Regulation 19 version of the Newcastle-under-Lyme (NuL) Local Plan has been assessed for their potential positive, negative or negligible impact on potentially vulnerable equalities groups. The following questions or indicators were used to inform the assessment of potential impacts:

1. Is the policy likely to target or exclude a specific equality group or community?
2. Is the policy likely to affect some equality groups or communities differently and can this be justified?
3. Is the policy likely to be equally accessed by all equality groups and communities? If not, can this be justified?
4. Are there any barriers that might make access difficult or stop different groups or communities using the service?
5. Are any measures required to mitigate negative adverse impacts?
6. Could the policy promote equality and good relations between different groups?
How?

K.3 Assessment of policies by characteristic

Table K.3.1: Assessment of potential impacts of the NuLBC policies on the protected characteristics

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
PSD1 Overall Development Strategy	+	+	0	0	0	0	0	0	0	The supply of sufficient housing to the borough through Policy PSD1 will be expected to positively impact increasingly isolated communities, such as a growing elderly population, or those with accessibility concerns, as well as provision of employment land which is likely to provide greater job opportunities for young people.
PSD2 Settlement Hierarchy	+	+	0	0	0	0	0	0	0	Policy PSD2 highlights how the Council seeks to focus housing development where there is appropriate provision of and accessibility to infrastructure and services, such as schools, jobs and shops, with likely benefits for older or younger age groups and disabled people.
PSD3 Distribution of Development	+	+	0	0	0	0	0	0	0	Policy PSD3 sets out the expected accommodation numbers of the different centres across the borough. This will ensure that housing is made more accessible to residents throughout the borough, including the elderly and less mobile people.
PSD4 Development Boundaries and the Open Countryside	+	+	0	0	0	0	0	0	0	The contribution to affordable and self-build housing through Policy PSD4 will contribute to the provision of and access to housing for a greater number of NuL residents.
PSD5 Green Belt	0	0	0	0	0	0	0	0	0	Policy PSD5 is not anticipated to have any significant effects on the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
PSD6 Health and Wellbeing	+	+	+	+	+	+	+	+	0	The provision of inclusive health and wellbeing services, infrastructure and facilities under Policy PSD6 will have a positive impact on several of the protected characteristics, ensuring more vulnerable members of the community have greater access to these public spaces and healthcare provisions.
PSD7 Design	+	+	+	+	+	+	+	+	0	Policy PSD7 sets out requirements for the design of developments. It seeks to ensure developments are inclusive, accessible and safe to access for all NuL residents.
CRE1 Climate Change	+	+	0	0	0	0	0	0	0	Policy CRE1 is likely to provide better access to affordable heating and locally grown food, creating more inclusive communities and simultaneously reducing the carbon footprint.
CRE2 Renewable Energy	0	0	0	0	0	0	0	0	0	Policy CRE2 is not anticipated to have any significant effects on the protected characteristics.
HOU1 Affordable Housing	+	0	0	0	0	0	0	0	0	Greater provision of affordable housing through Policy HOU1 will mean a greater proportion of people have access to appropriate housing suitable to meet their needs, most notably first-time buyers which is likely to be younger age groups.
HOU2 Housing Mix and Density	+	+	0	0	0	0	0	0	0	Policy HOU2 sets out consideration for the specific housing need of older people within the borough who have more specialist needs particularly in terms of location and accessibility.
HOU3 Housing Standards	+	+	0	0	0	0	0	0	0	The requirement for residential development and social rented housing to meet accessibility needs, such as wheelchair access, as set out in Policy HOU3 is likely to result in a positive impact for age and disability of the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
HOU4 Gypsy, Travellers and Travelling Showpeople	0	0	0	0	0	+	0	0	0	The policy seeks to meet the identified pitch/plot requirements for Gypsies, Travellers and Travelling Showpeople which will be likely to have a positive impact on meeting the accommodation needs of this ethnic group.
HOU5 Specialist Needs Housing	+	+	0	0	0	0	0	0	0	The provision of housing for residents, such as older people, with specific needs and how they might change over time is set out in Policy HOU5. This policy is likely to have a positive impact on age and disability.
HOU6 Self Build and Custom Dwelling.	+	+	0	0	0	0	0	0	0	Self-build / custom build developments as advocated under Policy HOU6 are likely to meet the specific needs of residents, such as those elderly or disabled through being encouraged to follow accessible and inclusive design practices.
HOU7 Homes in Multiple Occupation	0	0	0	0	0	0	0	0	0	Policy HOU7 is not anticipated to have any significant effects on the protected characteristics.
HOU8 Rural and First Home Exception Sites	+	+	0	0	0	0	0	0	0	The provision of housing under Policy HOU8 seeks to meet the local need in terms of affordability and access to local services, facilities and employment. This will ensure the inclusion of those increasingly vulnerable members of communities.
HOU9 Community Led Exception Sites	+	+	0	0	0	0	0	0	0	Policy HOU9 will be expected to meet the varied needs of residents in NuL in accordance with other relevant Local Plan policies, including Policies PSD7, HOU2 and HOU3. Therefore, Policy HOU9 is expected to positively impact those with specific housing needs including the elderly and disabled.
HOU10 Extensions, Alterations and Relationships between Dwellings	+	+	0	0	0	0	0	0	0	Policy HOU10 seeks to ensure extensions, alterations and relationships between dwellings are considerate of accessibility concerns and are able to adapt and meet the needs of a diverse range of users.
HOU11 Tandem or Backland Development	0	0	0	0	0	0	0	0	0	Policy HOU11 is not anticipated to have any significant effects on the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
EMP1 Employment	+	0	0	0	0	0	0	0	0	Policy EMP1 is anticipated to have a positive impact on the age protected characteristic as it is likely to provide sustainable and accessible opportunities for young people.
EMP2 Existing Employment Sites	0	0	0	0	0	0	0	0	0	Policy EMP2 is not anticipated to have any significant effects on the protected characteristics.
EMP3 Tourism	0	0	0	0	0	0	0	0	0	Policy EMP3 is not anticipated to have any significant effects on the protected characteristics.
RET1 Retail	0	0	0	0	0	0	0	0	0	Policy RET1 is not anticipated to have any significant effects on the protected characteristics.
RET2 Shop Fronts, Advertisements, New Signage	0	0	0	0	0	0	0	0	0	Policy RET2 is not anticipated to have any significant effects on the protected characteristics.
RET3 Restaurants, Cafes, Pubs and Hot Food Takeaways	0	0	0	0	0	0	0	0	0	Policy RET3 is not anticipated to have any significant effects on the protected characteristics.
RET4 Newcastle-under-Lyme Town Centre	+	+	0	0	0	+	+	0	0	Policy RET4 seeks to create an accessible town centre, with corresponding sustainable transport options, a diverse range of retail options and different cultural opportunities for example access to different religious festival celebrations. Therefore, this policy is likely to positively affect several of the protected characteristics.
RET5 Kidsgrove Town Centre	+	0	0	0	0	0	0	0	0	The provision of improved public transport access to Kidsgrove town centre through Policy RET5 is likely to result in greater levels of accessibility to those who are more isolated and vulnerable, such as rural elderly residents. Therefore, this policy is expected to have a positive impact on the age protected characteristic.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
IN1 Infrastructure	+	+	+	+	+	+	+	0	0	The provision of infrastructure including affordable housing, healthcare and education through Policy IN1 is likely to have a positive impact on the majority of the protected characteristics as new development will provide access to these services and amenities for all members of the community.
IN2 Transport and Accessibility	+	+	+	+	+	+	+	+	0	Provision of adequate transport infrastructure and links will be expected to increase accessibility to local infrastructure, services and facilities across the borough for all members of the community. As such, this is expected to have a positive impact on the majority of the protected characteristics.
IN3 Access and Parking	0	0	0	0	0	0	0	0	0	Policy IN3 is not anticipated to have any significant effects on the protected characteristics.
IN4 Cycleways, Bridleways and Public Rights of Way	0	0	0	0	0	0	0	0	0	Policy IN4 is not anticipated to have any significant effects on the protected characteristics.
IN5 Provision of Community Facilities	+	+	+	+	+	+	+	+	0	Through safeguarding community facilities, Policy IN5 is likely to preserve facilities and amenities such as recreational opportunities, open spaces and access to shared social spaces. Therefore, it is likely to have a positive impact on several of the protected characteristics.
IN6 Telecommunications Development	0	0	0	0	0	0	0	0	0	Policy IN6 is not anticipated to have any significant effects on the protected characteristics.
IN7 Utilities	0	0	0	0	0	0	0	0	0	Policy IN7 is not anticipated to have any significant effects on the protected characteristics.
SE1 Pollution and Air Quality	+	+	0	0	0	0	0	0	0	Policy SE1 has the potential to reduce the likelihood of residents being exposed to unacceptable levels of air pollution. Lung health is particularly important consideration for younger and older people and some people with disabilities.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
SE2 Land Contamination	0	0	0	0	0	0	0	0	0	Policy SE2 is not anticipated to have any significant effects on the protected characteristics.
SE3 Flood Risk Management	0	0	0	0	0	0	0	0	0	Policy SE3 is not anticipated to have any significant effects on the protected characteristics.
SE4 Sustainable Drainage Systems	0	0	0	0	0	0	0	0	0	Policy SE4 is not anticipated to have any significant effects on the protected characteristics.
SE5 Water Resources and Water Quality	0	0	0	0	0	0	0	0	0	Policy SE5 is not anticipated to have any significant effects on the protected characteristics.
SE6 Open Space, Sports and Leisure Provision	+	+	+	+	+	+	+	+	0	Policy SE6 is likely to ensure the provision of open and green spaces for residents in the area. This will ensure all members of society, have access to outdoor recreation and leisure spaces.
SE7 Biodiversity Net Gain	0	0	0	0	0	0	0	0	0	Policy SE7 is not anticipated to have any significant effects on the protected characteristics.
SE8 Biodiversity and Geodiversity	0	0	0	0	0	0	0	0	0	Policy SE8 is not anticipated to have any significant effects on the protected characteristics.
SE9 Historic Environment	0	0	0	0	0	0	0	0	0	Policy SE9 is not anticipated to have any significant effects on any of the protected characteristics.
SE10 Landscape	0	0	0	0	0	0	0	0	0	Policy SE10 is not anticipated to have any significant effects on any of the protected characteristics.
SE11 Trees, Hedgerows and Woodland	0	0	0	0	0	0	0	0	0	Policy SE11 is not anticipated to have any significant effects on any of the protected characteristics.
SE12 Amenities	0	0	0	0	0	0	0	0	0	Policy SE12 is not anticipated to have any significant effects on the protected characteristics.
SE13 Soil and Agricultural Land	0	0	0	0	0	0	0	0	0	Policy SE13 is not expected to have any significant effects on the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
SE14 Green and Blue Infrastructure	+	+	+	+	+	+	+	+	0	Policy SE14 sets out the requirement for new development to contribute and be well connected to Green and Blue Infrastructure networks, including supporting active travel and access to high-quality green space. This is likely to have a positive impact on several of the protected characteristics as it could provide benefits for health and wellbeing and access to safe and sustainable transport options, for example, for all members of the community.
RUR1 Rural Economy	0	0	0	0	0	0	0	0	0	Policy RUR1 is not anticipated to have any significant effects on the protected characteristics.
RUR2 Rural Workers	0	0	0	0	0	0	0	0	0	Policy RUR2 is not anticipated to have any significant effects on the protected characteristics.
RUR3 Extensions and Alterations to Buildings Outside of Settlement Boundaries	+	+	0	0	0	0	0	0	0	The provision of safely accessible extensions and alterations through Policy RUR3 are likely to positively impact the age and disability protected characteristics, due to potential benefits for those with more limited mobility.
RUR4 Replacement Buildings Outside of Settlement Boundaries	+	+	0	0	0	0	0	0	0	Policy RUR4 is likely to positively impact the age and disability protected characteristics, as it seeks to ensure replacement buildings are safely accessible including for those with more limited mobility.
RUR5 Re-use of Rural Buildings for Residential Use	+	+	0	0	0	0	0	0	0	Policy RUR5 is expected to have a positive impact on vulnerable members of society through ensuring re-used buildings are safely accessible including for those with more limited mobility.
SA1 General Requirements	+	+	0	0	0	0	0	0	0	Under Policy SA1, the provision of an appropriate mix of affordable housing which will meet accessibility standards is expected to have a positive impact on the age and disability protected characteristics.

K.3.1 Summary

- K.3.1.1 The Newcastle-under-Lyme Local Plan sets out a vision for the future development of the borough, considering the local opportunities in needs with regard to housing, employment, the economy, infrastructure and community facilities. Whilst doing so, the Local Plan will set out a means through which the natural and historic environment will be conserved and enhanced, adaptation and mitigation to climate change is supported, and places continue to be well designed.
- K.3.1.2 Many of the policies associated with the Local Plan seek to deliver benefits for the whole community, not specifically those related to the protected characteristics. However, some of the policies will have the potential for direct or indirect impact on different groups. Each policy has been assessed for potential positive, negative or neutral impacts on potentially vulnerable groups.

K.3.2 Analysis by characteristic

Age

- K.3.2.1 The 'age' protected characteristic includes the consideration of all ages and age ranges in the community. This assessment found that the impacts of the policies are generally positive for the people of different ages, particularly the potentially more vulnerable age groups, such as the elderly and young people. In seeking to deliver a sustainable future for the area, the Local Plan aims to create communities which are within sustainable distances to services and facilities where possible, which are sufficient to meet day-to-day needs including schools, employment opportunities, food stores and public and open spaces. Ensuring these services and amenities are accessible many benefit these groups where there may be increasing isolation in rural locations.
- K.3.2.2 Specific policies may also benefit this characteristic, for example, Policy IN2 'Transport and Accessibility' which sets out the provision for sustainable modes of transport which are accessible and integrated within the community, including active travel routes, appropriate provision of parking and support for ultra-low emission vehicles, ensuring more isolated members of the community (such as the elderly) can access necessary amenities and services. Policy SE6 'Open Space, Sports and Leisure Provision' seeks to safeguard open space, sports and leisure facilities and ensure these are provisioned for where new developments will occur, ensuring young people have access to active and green spaces. Policy HOU1 'Affordable Housing' seeks to meet the identified local needs for the area, such as younger people more likely to be first-time buyers. Policy SE1 'Pollution and Air Quality' aims to ensure development proposals and growth in the borough does not result in significant increase in residents' exposure to air pollution, particularly in and around AQMAs.

Disability

- K.3.2.3 The policies within the Local Plan are written positively to benefit all members of the community. Some policies are identified as having positive impacts on people with disabilities. For example, Policy HOU5 'Specialist Needs Housing' seeks to meet the needs of the local area, ensuring new care homes and specialist accommodation is accessible and connected to key facilities and designed to incorporate wheelchair access. Policy HOU10 'Extensions, Alterations and Relationships Between Dwellings' aims to ensure amendments to properties are in keeping with the surrounding area and consider the accessibility needs of residents and visitors. Policy PSD7 'Design' seeks to ensure design is in keeping with the areas character and identity and is inclusive and accessible for all residents.

Gender

- K.3.2.4 The policies within the Local Plan are regarded as generally leading to positive or neutral effects for all members of the community. Some policies are identified as having indirect positive impacts on the 'gender' characteristic. For example, PSD7 'Design' seeks to ensure design is in keeping with the areas character and identity, and available facilities are inclusive and accessible for all residents. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

Gender reassignment

- K.3.2.5 The policies within the Local Plan are regarded as generally leading to positive or neutral effects for all members of the community. Some policies are identified as having positive impacts on this group, similarly to the 'gender' characteristic above. For example, Policy PSD7 'Design' seeks to ensure design is in keeping with the areas character and identity, and available facilities are inclusive and accessible for all residents. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

Pregnancy and maternity

- K.3.2.6 The policies within the Local Plan are identified to result in positive or neutral effects for all members of the community. Some policies are identified as having positive impacts on people who are pregnant or have young children. For example, Policy IN1 'Infrastructure' sets out the Council's support for infrastructure related development throughout the borough, including healthcare and community facilities, among others. It is also likely that policies relating to accessibility or which include improved access to shared facilities, such as Policy SE14 'Green and Blue Infrastructure', are likely to more widely benefit this group with pregnancy and maternity often resulting in more limited mobility and access to and storage of pushchairs. Given the potential health care and community infrastructure needs have on this protected characteristic group, some of the policies in the Plan have been identified as having a positive impact for this group.

Race

- K.3.2.7 The policies within the Local Plan are likely to result in positive or neutral effects for all members of the community, although some policies are identified as having positive impacts on the 'race' characteristic. For example, Policy HOU4 'Gypsy, Travellers and Travelling Showpeople' seeks to ensure the provision accommodation for Gypsies, Travellers and Travelling Showpeople in the area, ensuring the needs of this group are met. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

Religion

- K.3.2.8 The policies within the Local Plan are regarded as generally being positive for all members of the community. Some policies are identified as having positive impacts on this group. For example, Policy RET4 'Newcastle-under-Lyme Town Centre' sets out the Council's support for opportunities for improving and enhancing the vitality of the town centre, including cultural opportunities and community facilities. Policy PSD7 'Design' seeks to ensure design is in keeping with the areas character and identity, and available facilities are inclusive and accessible for all residents. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

Sexual orientation

- K.3.2.9 The policies within the Local Plan are regarded as generally leading to positive or neutral effects for all members of the community. Some policies are identified as having a positive impact on this group. For example, Policy PSD6 'Health and Wellbeing' aims to foster safe, healthy, fulfilling and active lifestyles throughout the borough and ensuring all different groups of people have access to necessary healthcare. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to better community cohesion.

Marriage and civil partnership status

- K.3.2.10 The policies within the Local Plan are regarded as generally leading to positive or neutral effects for all members of the community and as having no differential impact on this group.



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