

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan

Including: Strategic Environmental Assessment and
Equality Impact Assessment

Volume 1 of 3 : Non-Technical Summary

May 2023



Sustainability Appraisal of the Newcastle-under-Lyme Local Plan

Including:
Strategic Environmental Assessment
and Equality Impact Assessment

Volume 1 of 3: Non-Technical Summary

LC-936	Document Control Box
Client	Newcastle-under-Lyme Borough Council
Report Title	Sustainability Appraisal of the Newcastle-under-Lyme Local Plan Volume 1 of 3: Non-Technical Summary
Status	Final
Filename	LC-936_Vol_1of3_NuL_R18_SA_Non-Technical_Summary_5_250523GW.docx
Date	May 2023
Author	LB & SS
Reviewed	GW & AH
Approved	ND

Front Cover: Newcastle-under-Lyme Market, Staffordshire

Non-Technical Summary

Introduction

- N1. Lepus Consulting Ltd (Lepus) has been instructed by Newcastle-under-Lyme Borough Council (NuLBC), to undertake a Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA) and Equality Impact Assessment (EqIA) of the Draft Newcastle-under-Lyme Local Plan.
- N2. This document comprises a Non-Technical Summary (NTS) of the SA for the Newcastle-under-Lyme Local Plan at the 'First Draft Local Plan' (Regulation 18) stage.
- N3. This NTS is presented as Volume 1 of a three-part series of reports that represent the entire SA. Volume 2 is the main SA report and Volume 3 is the appendices. All documents are available to read together on the Council's website: <https://www.newcastle-staffs.gov.uk>.
- N4. This NTS provides an overview of the SA process and describes the key sustainability effects expected to arise as a result of the development options and draft policies presented within the Draft Plan.

What is Sustainability Appraisal?

- N5. 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 local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.
- N6. SA is the process of informing and influencing the preparation of a local plan 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.
- N7. 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**).

¹ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 05/05/23]

² The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 05/05/23]

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: 05/05/23]

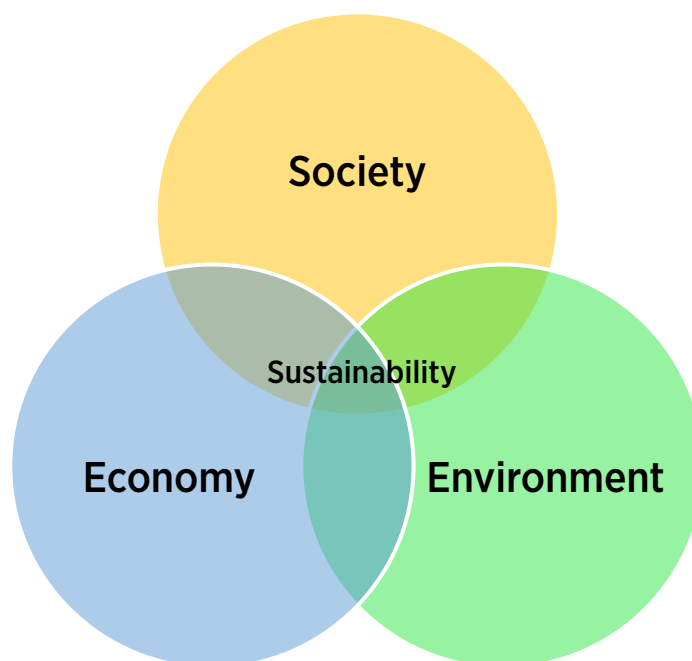


Figure N.1: Sustainable development

- N8. Currently, the Local Plan is at the plan-making stage Regulation 18 of the Local Plan Regulations 2012⁴, as shown Stage B of **Figure N.2**.

The Newcastle-under-Lyme Local Plan

- N9. 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 places⁵.

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

⁵ Newcastle-under-Lyme Borough Council (2023) Emerging Newcastle-under-Lyme local plan. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan> [Date accessed: 21/04/23]

SA Process

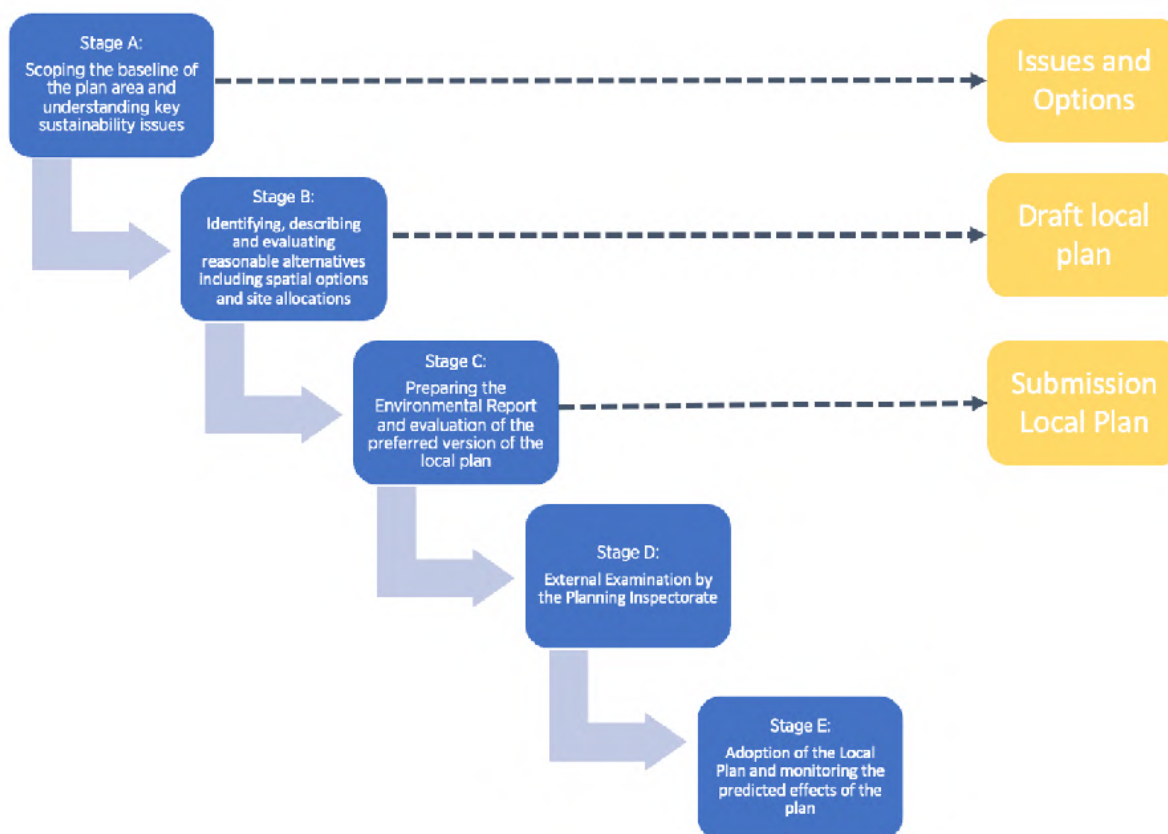


Figure N.2: Key stages in the Sustainability Appraisal process and local plan preparation stages

Newcastle-under-Lyme

- N10. The borough of Newcastle-under-Lyme comprises approximately 21,095ha and lies within the county of Staffordshire, with a population of 123,300 according to the 2021 census⁶. 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.
- N11. The borough is a mix of rural and urban settings, where urbanised areas are located in the northeast surrounding Stoke-on-Trent (see **Figure N.3**). The strategic centre of the borough is Newcastle-under-Lyme, a market town, located to the east of the borough.

⁶ 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: 21/04/23]

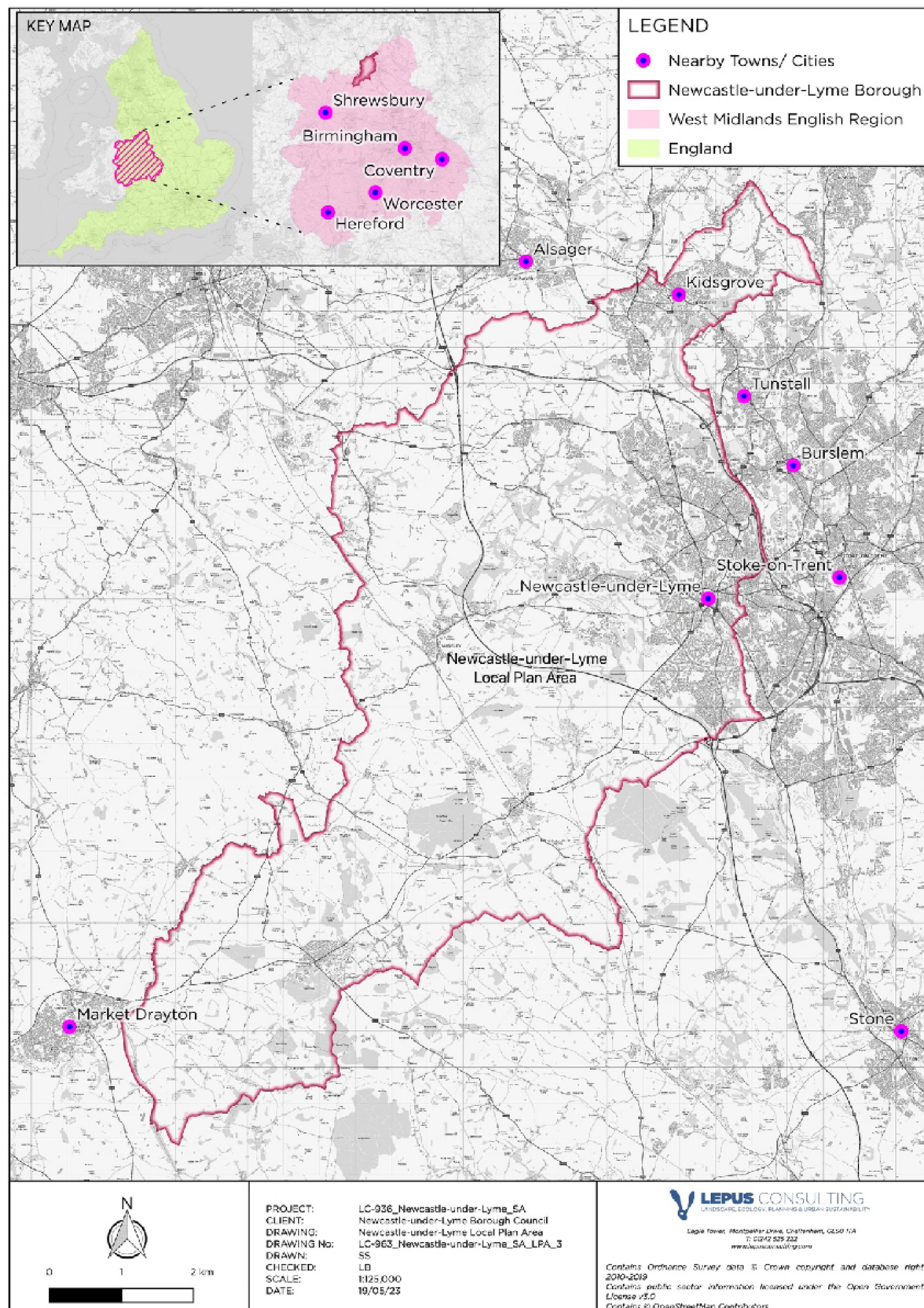


Figure N.3: Map of Newcastle-under-Lyme

The SA process so far

- N12. The first phase of preparation for the SA was the scoping stage. 'Scoping' is the process of deciding the scope and level of detail of an SA, including the environmental effects and alternatives to be considered, the assessment methods to be used, and the structure and contents of the SA Report, in accordance with Planning Practice Guidance (PPG)⁷.
- N13. The Scoping Report covers the early stages of the SA process and includes information about:
- Identifying other relevant policies, plans and programmes, and environmental objectives;
 - Collecting baseline information;
 - Identifying environmental issues and problems; and
 - Developing the SA Framework.
- N14. The scoping process identified key sustainability issues. Reviewed plans and programmes relevant to the SA process, and designed the SA Framework for use in assessing the effects of the plan.
- N15. The Scoping Report was prepared by NuLBC in 2021⁸ and was subject to a five-week statutory consultation period of consultation with the statutory consultees (Natural England, Historic England and the Environment Agency). The Scoping Report was updated following consideration of comments received during the consultation. The comments received have been taken into account for the preparation of the Regulation 18 SA Report and can be found within **Table 1.2** of the R18 SA Report.

Methodology

- N16. In light of the identified key issues, 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, evaluated and compared.
- N17. Since 2021, as part of a re-fresh and with the engagement of Lepus, the previous SA Objectives as set out in the SA Scoping Report⁹ have been reviewed and consolidated to ensure that they are streamlined, concentrate on meaningful evaluation and provide a greater focus on the topics as set out in the SEA Regulations (biodiversity, flora, fauna, air, climatic factors, cultural heritage, human health, landscape, material assets, population, soil and water).

⁷ DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 05/05/23]

⁸ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed: 14/04/23]

⁹ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed: 14/04/23]

- N18. The full SA Framework including indicators is presented in **Appendix A**, with a summary of the 12 SA Objectives shown in **Figure N.4**. It should be noted that the order of SA Objectives does not infer any prioritisation.
- N19. Each of the reasonable alternatives, options and policies appraised in this report have been assessed for their likely sustainability impacts on each SA Objective of the SA Framework. The SA has considered positive, negative, secondary, cumulative and synergistic effects.



Figure N.4: SA Framework Summary

Reasonable alternatives: Identification, description and evaluation

N20. It is a requirement of the SEA Regulations that the assessment process must identify, describe and evaluate reasonable alternatives. There is no precise guide as to what constitutes a 'reasonable alternative'. The Council has identified reasonable alternatives for the Local Plan comprising:

- three housing growth options;
- three employment growth options;
- six growth direction options;
- 141 reasonable alternative site allocations; and
- 23 draft strategic policies.

N21. The SA has assessed the various reasonable alternatives on a comparable basis against the SA Framework to identify likely sustainability impacts. It is the Council's role to use the SA findings, alongside other evidence base material, to decide which alternatives to 'select' for allocation in the Local Plan and which to 'reject' from further consideration.

Identification of Housing growth options

N22. The Regulation 18 SA Report assessed three options for housing growth, as summarised in **Table N.1**. According to the Housing and Economic Needs Assessment Update 2023¹⁰, as of 2022, the housing figures for Newcastle-under-Lyme is 358 homes per year, based on the national standard method. As a result, the Local Plan that dates from 2020-2040, must meet the total demand of 7,160 homes.

N23. The Council has identified two reasonable alternative housing numbers for consideration alongside the standard method figure, based on different modelled employment forecasts as set out in the Housing and Economic Needs Assessment Update.

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

Table N.1: Newcastle-under-Lyme Housing Growth Options identified by NuLBC

Evaluation of Housing growth options

N24. Option 2 performs best against environmental objectives, due to having the smallest housing number. However, option 3 performs best in regard to equality (SA Objective 10 Equality) due to the housing need being met and exceeded. All options will be expected to place

¹⁰ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

increased pressures on local infrastructure (SA Objective 9 Health & Wellbeing, SA Objective 11 Transport & Accessibility) due to the increase in dwellings.

	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	--	-	-	-	+/-	-	+/-	-	-	++	-	+

Table N.2: Impact matrix of the three housing growth options

Selection and rejection of Housing growth options

- N25. The Council has confirmed 'Option 1' to be taken forward as it has been informed by a local housing need assessment, conducted using the standard method. The figure is considered to be aligned with economic jobs growth forecasts and represents the most deliverable option when balanced against site opportunities and constraints in the borough.

Identification of Employment options

- N26. The Regulation 18 SA Report assessed three options for employment growth, as summarised in **Table N.3**. The Economic Needs Assessment (2020) identified that up to 56.6ha of employment land could be required over the period until 2037. The Housing and Economic Needs Assessment Update in March 2023¹¹ suggests that between 36.5ha and 68.8ha of employment land is required for the updated Local Plan period to 2040.

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

Table N.3: Newcastle-under-Lyme Employment Growth Options identified by NuLBC

Evaluation of Employment options

- N27. Uncertainty surrounding the size, location, and nature of the three options has limited the ability to make firm conclusions in respect to environmental variables. Option 3 will deliver

¹¹ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme, March 2023

the highest level of sustainability performance in relation to social and economic benefits due to its ability to deliver the highest potential for job growth.

	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	+	-	++

Table N.4: Impact matrix of the three employment growth options

Selection and rejection of Employment options

N28. The Council has identified 'Option 1' to be taken forward as the level of jobs and economic growth is considered to align with the outcomes of the local housing need assessment conducted using the standard method. It represents the most deliverable option to support economic growth but balanced against site opportunities and constraints in the borough.

Identification of Growth Direction Options

N29. Six reasonable alternative growth direction options were identified by the Council and assessed in the Regulation 18 SA Report as set out in **Table N.5**.

N30. As outlined in the Issues and Strategic Options document¹², NuLBC intent to broadly align the spatial strategy with the hierarchy centres in line with the level of services and infrastructure provision. However, a number of constraints are present within the borough, including the presence of the Green Belt, which limit the options in terms of the potential for the higher-tier centres to accommodate large proportions of growth.

N31. The Council seek to investigate all potential sources for sites in the following order of preference, in line with national guidance:

- Brownfield, under-utilised or undeveloped land within development boundaries;
- Optimising density of development sites;
- Consider exporting a proportion of housing to neighbouring authorities; and
- Consider the release of Green Belt land.

N32. Given the challenges in identifying sufficient land for significant growth within the development boundaries, the Council have suggested that it may be necessary 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.

¹² 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: 14/04/23]

Growth Direction Option	Description of Growth Direction Option
Growth Direction 1	Development on strategic sites outside the Green Belt – Large rural extensions
Growth Direction 2	Strategic Green Belt release for an urban extension – University Growth Corridor
Growth Direction 3	Green Belt release for development of strategic sites – Talke and Chesterton expansion
Growth Direction 4	Green Belt release for development of strategic sites – Kidsgrove expansion
Growth Direction 5	Green Belt release for development of strategic sites – Audley Rural expansion
Growth Direction 6	Combination of strategic sites across the borough comprising of both sites outside the Green Belt and sites which require Green Belt release

Table N.5: Newcastle-under-Lyme Growth Direction Options identified by NuLBC

Evaluation of Growth Direction Options

- N33. Determining the best overall performing Growth Direction Option is difficult as the performance varies dependent on the SA Objective being considered. Options performing well for development and economic needs put the most pressure on environmental resources and social facilities.
- N34. It is however possible to identify the best option in relation to specific SA Objectives. For example, Option 1 being strongest when considered for landscape (SA Objective 8) and Option 3 considered the best for Biodiversity, Flora and Fauna (SA Objective 3).
- N35. Option 6 presents the overall most deliverable approach, despite SA specific benefits from each option. Option 6 presents a balanced approach that can support development in strategic and urban centres whilst also supporting development in rural settings at a smaller scale.
- N36. The SA assessment findings for the six growth direction options are summarised in **Table N.6**.

	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
1	--	--	-	--	-	-	-	+	-	-	-	-
2	+	+/-	-	-	0	-	-	--	+	+	+	+
3	-	-	+/-	+	0	-	-	--	+	+	+/-	+
4	-	+/-	-	+	0	-	-	--	+	+	+	+
5	--	-	-	-	-	-	-	--	-	-	-	-
6	-	-	-	+/-	+/-	-	+/-	-	-	+/-	+/-	+/-

Table N.6: Impact matrix of the six growth direction options

Selection and rejection of Growth Direction Options

- N37. The Council has confirmed that '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.

Reasonable alternatives: Policies

- N38. At this stage of the plan making process, 23 draft policies have been prepared by the Council and assessed in the Regulation 18 SA Report.

Table N.7: Draft Local Plan policies

Policy Reference	Policy Name
PSD1	Overall Development Strategy
PSD2	Settlement Hierarchy
PSD3	Distribution of Development
PSD4	Development Boundaries and the Open Countryside
PSD5	Green Belt and Safeguarded Land
PSD6	Health and Wellbeing
PSD7	Design
CRE1	Climate Change
CRE2	Renewable Energy
HOU1	Affordable Housing
HOU2	Housing Mix, Density and Standards
HOU3	Gypsy, Travellers and Travelling Showpeople
EMP1	Employment
RET1	Retail
IN1	Infrastructure
IN2	Transport and Accessibility
SE1	Pollution, Contamination and Amenity
SE2	Flood Risk, Water Resources and Management
SE3	Water Resources and Water Quality
SE4	Open Space, Sports and Leisure Provision
SE5	Biodiversity and Geodiversity
SE6	Historic Environment
SE7	Landscape

- N39. No reasonable alternative policies have been identified.
- N40. The Regulation 18 SA Report assessed 23 draft Local Plan policies, with the assessments presented in full in **Appendix D**.

- N41. The assessment of these 23 policies identified a range of sustainability impacts (see **Table 6.2**). Several policies identified to have minor or major negative impacts on Climate Change (SA Objective 1), Air (SA Objective 2) and Natural Resources and Waste (SA Objective 4). A large number of “PSD” policies have been identified as having minor or negative impacts on the above objectives.
- N42. Negligible impacts were identified for SA objectives where the policies seek to mitigate or manage potential adverse impacts as a result of the proposed development; for example, where the policies incorporate conservation and enhancement of heritage assets (SA Objective 7), measures to mitigate flooding and improve water quality (SA Objective 5 and 6) or measures aimed to promote sustainable transport and help produce renewable energy (SA Objective 11 and SA Objective 4), to name a few.
- N43. Positive impacts were identified across a number of assessed policies, particularly in relation to socially centred objectives, such as Health and Wellbeing (SA Objective 9), Equality (SA Objective 10), Transport and Accessibility (SA Objective 11), as a result of providing the borough with improved connection to existing facilities and the introduction of new facilities and infrastructure set out in the policies. Although positive impacts on Climate Change (SA Objective 1) were also prevalent across policies, minus policy “PSD1” due to the large influence the policy will have on increasing pollution in the area, scoring the only negative on Climate Change (SA Objective 1) across all policies.

Table N.8: Impact matrix of the 23 Draft Local Plan policies

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Draft Policy	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	+	+	+	0	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
HOU3	0	0	0	0	0	0	0	0	0	+	+	0

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Draft Policy	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++
RET1	0	0	0	0	0	0	0	+	+	+	+	+
IN1	+	0	+	+	+	+	0	0	+	+	+	0
IN2	+	+	0	0	0	+	0	+	+	+	++	+
SE1	+	+	+	+	0	+	0	+	+	+	+	0
SE2	+	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
SE6	0	0	0	0	0	0	++	+	0	0	0	+
SE7	+	0	+	0	+	+	+	++	+	0	0	0

Evaluation of the reasonable alternative development allocations

- N44. A total of 141 reasonable alternative sites have been identified, described, and evaluated through the Plan-making process to date.
- N45. Newcastle-under-Lyme borough comprises of a mix of rural, urban and sub-urban settings and therefore, the SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework.
- N46. Negative impacts were mainly related to issues associated with air quality due to the proximity of the new sites to the major roads; local wildlife and habitat sites; loss of previously undeveloped land, BMV soil, and coinciding with MSAs; coinciding with SWFR and landscape sensitivity zones, proximity to PRoW network, and potential for coalescence/sprawl; and the access of site end users to healthcare facilities, schools, and transport services.
- N47. Positive impacts were identified in relation to the provision of new housing and employment floorspace, as well as potential for provision of LZC technologies, provision for waste management and recycling, benefits to health and accessibility as many sites are located within a sustainable distance to public greenspaces; and coinciding with Flood Zone 1 where fluvial flood risk is low.
- N48. Following consideration of the SA findings, as well as other evidence base studies such as viability assessments, the Council have selected 42 preferred development sites for allocation in the Local Plan.

Understanding the SA Report

N49. The contents of the Regulation 18 SA Report are listed as follows:

- **VOLUME 1: Non-Technical Summary** (this document) provides a summary of the Regulation 18 SA work.
- **VOLUME 2: Main SA Report**
 - **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out the SA methodology.
 - **Chapter 3** sets out the assessment of housing growth options.
 - **Chapter 4** sets out the assessment of employment growth options.
 - **Chapter 5** sets out the assessment of growth direction options.
 - **Chapter 6** provides an overview of the assessment of draft policies.
 - **Chapter 7** provides an overview of the assessment of reasonable alternative sites.
 - **Chapter 8** outlines the next steps of the SA process.
- **VOLUME 3: Appendices**
 - **Appendix A** shows the full SA Framework.
 - **Appendix B** sets out the review of relevant Policies, Plans and Programmes (PPPs).
 - **Appendix C** provides additional context to **Chapter 2** of the main Regulation 18 SA Report regarding the topic specific methodologies and assumptions used to assess reasonable alternative sites.
 - **Appendix D** presents the assessment of 141 additional reasonable alternative sites (pre-mitigation).
 - **Appendix E** presents the assessment of the 23 draft Local Plan policies.
 - **Appendix F** presents the Equality Impact Assessment (EqIA) information.



Lepus Consulting
Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan

Including: Strategic Environmental Assessment and
Equality Impact Assessment

Volume 2 of 3 : Regulation 18 SA Report

May 2023



Sustainability Appraisal of the Newcastle-under-Lyme Local Plan

Including:
Strategic Environmental Assessment
and Equality Impact Assessment

Volume 2 of 3: Regulation 18 SA Report

LC-936	Document Control Box
Client	Newcastle-under-Lyme Borough Council
Report Title	Sustainability Appraisal of the Newcastle-under-Lyme Local Plan Volume 2 of 3: Regulation 18 SA Report
Status	Final
Filename	LC-936_Vol_2of3_NuL_R18_SA_11_250523SS.docx
Date	May 2023
Author	LB & SS
Reviewed	GW & AH
Approved	ND

Front Cover: Newcastle-under-Lyme Market, Staffordshire

About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of Newcastle-under-Lyme Borough Council. There are a number of limitations that should be borne in mind when considering the conclusions of this report. No party should alter or change this report without written permission from Lepus.

© Lepus Consulting Ltd

This Regulation 18 SA Report is based on the best available information, including that provided to Lepus by Newcastle-under-Lyme Borough Council and 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. This report was prepared between April and May 2023 and is subject to and limited by the information available during this time. This report has been produced to assess the sustainability effects of

the Newcastle-under-Lyme Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

Client comments can be sent to Lepus using the following address.

Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire
GL50 1TA

Telephone: 01242 525222

E-mail: enquiries@lepusconsulting.com

Website: www.lepusconsulting.com

Contents

1	Introduction.....	1
1.1	Background.....	1
1.2	Newcastle-under-Lyme Borough.....	1
1.3	The Newcastle-under-Lyme Local Plan.....	4
1.4	Integrated approach to SA and SEA.....	5
1.5	Equality Impact Assessment.....	5
1.6	Best Practice Guidance.....	6
1.7	Sustainability Appraisal.....	7
1.8	The SA process so far.....	8
1.9	Scoping Report.....	8
1.10	Signposting for this report.....	12
2	Assessment Methodology and Scope of Appraisal.....	13
2.1	SA Framework.....	13
2.2	Assessment of Reasonable Alternatives.....	15
2.3	Impact assessment and determination of significance.....	16
2.4	Sensitivity.....	16
2.5	Magnitude.....	17
2.6	Significant effects.....	17
2.7	Limitations of predicting effects.....	19
2.8	Methodology for assessment of growth options and draft policies.....	20
3	Assessment of Housing Growth Options.....	21
3.1	Preface.....	21
3.2	Assessment.....	22
3.3	Conclusion.....	27
3.4	Selection and rejection.....	27
4	Assessment of Employment Growth Options.....	28
4.1	Preface.....	28
4.2	Assessment.....	29
4.3	Conclusion.....	32
4.4	Selection and rejection.....	32
5	Assessment of Growth Direction Options.....	33
5.1	Preface.....	33
5.2	Assessment.....	36
5.3	Conclusion.....	42
5.4	Selection and rejection.....	43
6	Assessment of Draft Policies.....	44
6.1	Preface.....	44
6.2	Overview of policy assessments.....	45
7	Assessment of Reasonable Alternative Sites.....	47
7.1	Preface.....	47
7.2	Overview of site assessments.....	56
7.3	Mitigation.....	61
7.4	Selection and rejection of sites.....	65
8	Next Steps.....	1
8.1	Consultation on the Regulation 18 Issues and Preferred Options SA Report.....	1
8.2	Responding to the consultation.....	1

Appendices

Appendix A	SA Framework
Appendix B	PPP Review
Appendix C	Topic-specific methodology for site assessments
Appendix D	Assessment of reasonable alternative sites
Appendix E	Assessment of draft policies
Appendix F	Equality Impact Assessment

Tables

Table 1.1: The Newcastle-under-Lyme Local Plan and Sustainability Appraisal process so far	8
Table 1.2: Consultation responses from statutory consultees on SA Scoping Report (August 2021)	9
Table 2.1: Summary of SA Objectives and changes since the Scoping stage	13
Table 2.2: Impact sensitivity	16
Table 2.3: Impact magnitude	17
Table 2.4: Guide to scoring significant effects	17
Table 2.5: Presenting likely impacts	20
Table 3.1: Newcastle-under-Lyme Housing Growth Options identified by NuLBC	21
Table 3.2: Impact matrix of the three housing growth options	22
Table 4.1: Newcastle-under-Lyme Employment Growth Options identified by NuLBC	28
Table 4.2: Impact matrix of the three employment growth options	29
Table 5.1: Newcastle-under-Lyme Growth Direction Options identified by NuLBC	35
Table 5.2: Impact matrix of the six Growth Direction Options	35
Table 6.1: Proposed Draft Plan policies	44
Table 6.2: Summary impact matrix table of strategic policies	46
Table 7.1: Reasonable alternative sites	49
Table 7.2: Summary impact matrix table of all reasonable alternative sites	58
Table 7.3: Likely adverse effects and policies for potential for mitigation	61
Table 7.4: Outline reasons for selection / rejection of reasonable alternative sites for the Newcastle-under-Lyme Local Plan	66

Boxes

Box 2.1: Schedule 1 of the SEA Regulations	15
---	----

Figures

Figure 1.1: Newcastle-under-Lyme administrative boundary	3
Figure 1.2: Sustainability appraisal process	7
Figure 5.1: Broad locations of Growth Direction Options 1-5 identified by NuLBC	34

Acronyms & Abbreviations

A&E	Accident and Emergency
ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
BMV	Best and most versatile
CfS	Call for Sites
DBEIS	Department for Business, Energy and Industrial Strategy
DEFRA	Department for Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Cooperate
EqIA	Equality Impact Assessment
EU	European Union
FEMA	Functional Economic Market Area
HENA	Housing and Economic Needs Assessment
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
IRZ	Impact Risk Zone
LNR	Local Nature Reserve
LSOA	Lower layer Super Output Area
LTP	Local Transport Plan
MHCLG	Ministry of Housing, Communities and Local Government
NHS	National Health Service
NNR	National Nature Reserve
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PPP	Policies Plans and Programmes
PRoW	Public Rights of Way
RIGS	Regionally Important Geological Site
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System

1 Introduction

1.1 Background

- 1.1.1 Newcastle-under-Lyme Borough Council (NuLBC) are in the process of writing the Newcastle-under-Lyme Local Plan. As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA) and Equality Impact Assessment (EqIA). The purpose of SA/SEA is to help guide and influence the decision-making process for NuLBC by identifying the likely sustainability effects of reasonable alternatives and various options.
- 1.1.2 The purpose of this SA report is to assess the sustainable development implications of proposals presented in the 'First Draft Local Plan' for Newcastle-under-Lyme Borough.
- 1.1.3 A range of reasonable alternatives or 'options' have been identified by NuLBC through the previous plan-making phase known as 'Issues and Strategic Options'; this includes housing and employment growth options, growth direction options. Taking into consideration the latest evidence base information, these options have been assessed within this SA Report. NuLBC have also identified a suite of reasonable alternative development sites, and a set of draft policies, which have been assessed through the SA.
- 1.1.4 SA is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.1.5 This SA document follows on from the SA Scoping Report prepared in May 2021, which was consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency) and an updated version published in August 2021¹.

1.2 Newcastle-under-Lyme Borough

- 1.2.1 Newcastle-under-Lyme borough comprises approximately 21,095ha and lies 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 administrative boundary of the borough is shown in **Figure 1.1**.
- 1.2.2 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. The population of the borough is 123,300 according to the 2021 Census².

¹ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed: 14/04/23]

² 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: 21/04/23]

- 1.2.3 The M6 passes through the borough alongside a network of A-roads and primary roads. One train station, Kidsgrove, is located within the borough, providing access to the nearby centres of Stoke-on-Trent and Crewe, and further afield.
- 1.2.4 Congestion is an issue across the key transport routes, with four Air Quality Management Areas (AQMA) declared due to exceedances in nitrogen dioxide (NO₂), at Kidsgrove, Newcastle-under-Lyme Town Centre, Maybank and Little Madeley. Although, air quality is reported to be improving in these areas.
- 1.2.5 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.
- 1.2.6 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.
- 1.2.7 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.
- 1.2.8 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.
- 1.2.9 According to the Index of Multiple Deprivation (IMD)³, Newcastle-under-Lyme borough has an average rank of 16,926 (out of 32,844 in England) indicating middling levels of deprivation. Two Lower Super Output Areas (LSOAs) in the borough fall within the 10% most deprived in England.
- 1.2.10 Major employment centres can be found within the various industrial estates and business parks, and within the town centres. Additionally, Keele University and its Science and Innovation Park are helping to diversify the borough's traditional manufacturing industries into a regional centre for biotech, medical, energy, ICT and service industries⁴.
- 1.2.11 A thorough record of environmental, social and economic baseline information for the plan area is set out in the SA Scoping Report⁵.

³ 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: 21/04/23]

⁴ Make It Stoke-on-Trent & Staffordshire (2023) Newcastle-under-Lyme. Available at: <https://www.makeitstokestaffs.co.uk/why-stoke-on-trent-and-staffordshire/lep-region/newcastle-under-lyme> [Date accessed: 21/04/23]

⁵ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed: 14/04/23]

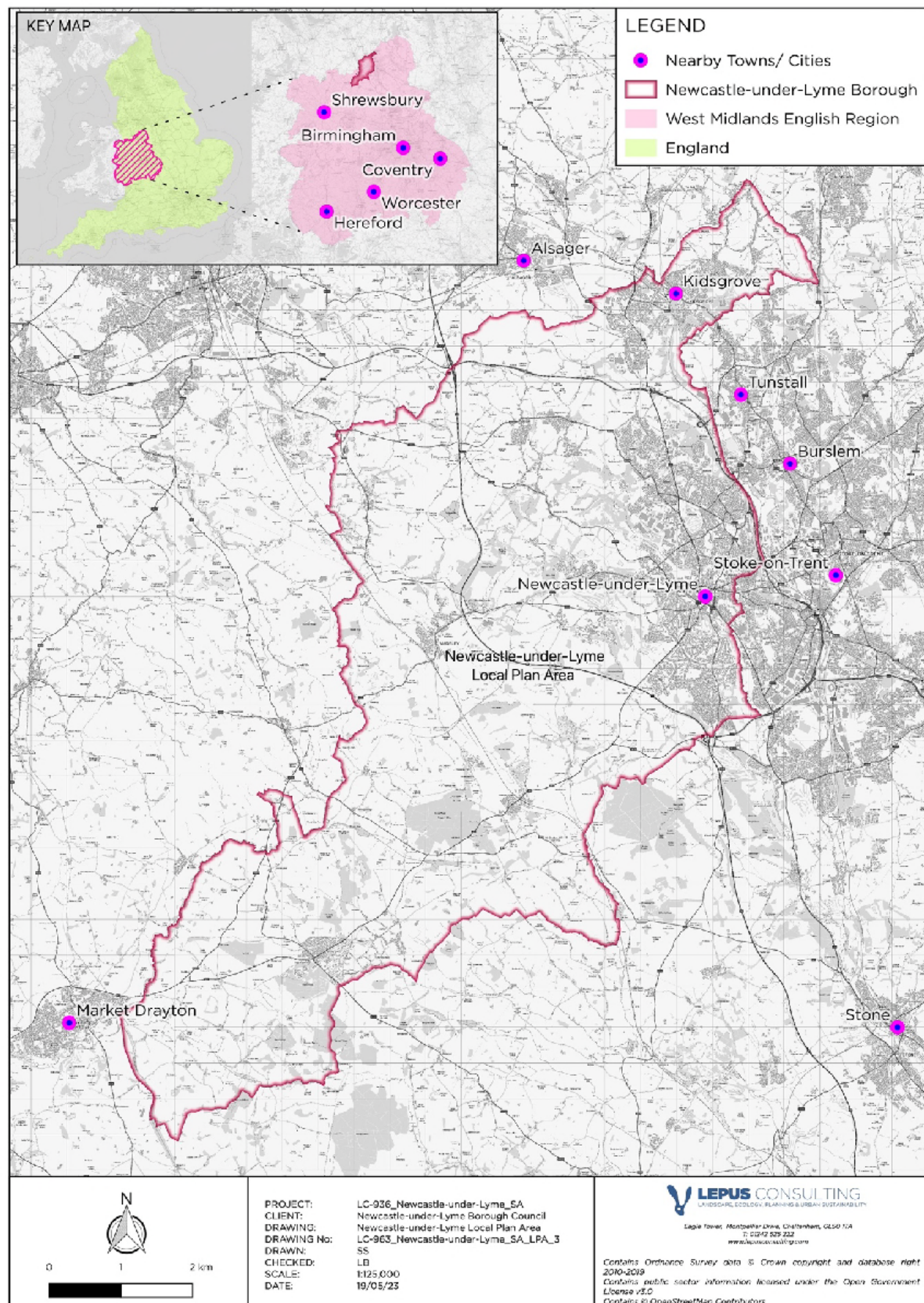


Figure 1.1: Newcastle-under-Lyme administrative boundary

1.3 The Newcastle-under-Lyme Local Plan

- 1.3.1 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.
- 1.3.2 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 places⁶.
- 1.3.3 The first stage of plan preparation was known as 'Issues and Strategic Options'. The Issues and Strategic Options document⁷ 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.
- 1.3.4 The Issues and Strategic Options Consultation was held between 1st November 2021 and 24th January 2022.
- 1.3.5 NuLBC are now at the plan making phase known as the 'First Draft Plan' stage, which sets out the Council's preferred approach to delivering growth in Newcastle-under-Lyme borough including draft policies and preferred sites for allocation, drawing on the findings of this SA Report, in addition to national planning policies and guidance, consultation feedback, and a range of other evidence studies and technical reports.
- 1.3.6 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.
- 1.3.7 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 local plan policies from the Newcastle-under-Lyme Local Plan (adopted 2003).

⁶ Newcastle-under-Lyme Borough Council (2023) Emerging Newcastle-under-Lyme local plan. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan> [Date accessed: 21/04/23]

⁷ 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: 14/04/23]

1.4 Integrated approach to SA and SEA

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC⁸ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive 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”*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁹ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004¹⁰ 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 2012¹¹. SA 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.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

1.5 Equality Impact Assessment

- 1.5.1 The aim of the Equality Act (2010)¹² 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.

⁸ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 14/04/23]

⁹ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 14/04/23]

¹⁰ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 14/04/23]

¹¹ The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date accessed: 14/04/23]

¹² Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 14/04/23]

- 1.5.2 EqlA 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 characteristic¹³, identified in the Equality Act. Completion of EqlAs is a legal requirement under race, disability and gender equality legislation.
- 1.5.3 The EqlA has been incorporated within SA Objective 10: Equality (see **Appendix A** for the full SA Framework), against which all options and reasonable alternatives are assessed. Additionally, each of the draft Local Plan policies have been screened against the protected characteristics of the Equality Act in **Appendix F**.

1.6 Best Practice Guidance

- 1.6.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal 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 environment¹⁴.
 - Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁵.
 - Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)¹⁶.
 - Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)¹⁷.
 - Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹⁸.

¹³ 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.

¹⁴ 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: 14/04/23]

¹⁵ 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/practicalguidesea.pdf [Date accessed: 14/04/23]

¹⁶ MHCLG (2021) National Planning Policy Framework. Available at:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 14/04/23]

¹⁷ DLUHC & MHCLG (2021) Planning practice guidance. Available at:
<https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 14/04/23]

¹⁸ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 14/04/23]

1.7 Sustainability Appraisal

1.7.1 This document is a component of the SA of the Newcastle-under-Lyme Local Plan. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to PPG on SA¹⁹.



Figure 1.2: Sustainability appraisal process

¹⁹ DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 14/04/23]

1.8 The SA process so far

1.8.1 **Table 1.1** below presents a timeline of stages of the Newcastle-under-Lyme Local Plan and SA process so far. To date, this represents Stages A and B of **Figure 1.2**.

Table 1.1: *The Newcastle-under-Lyme Local Plan and Sustainability Appraisal process so far*

Date	Local Plan Stage	Sustainability Appraisal
November 2021 – January 2022	Regulation 18 Issues and Strategic Options Consultation The first version of the Local Plan set out the proposed vision and objectives, and key elements of the spatial strategy. It also sought views from the public, private sector and key stakeholders on the scope of the Local Plan including options for what direction it should take.	SA Scoping Report (prepared by NuLBC) This report identifies the scope and level of detail to be included in the SA, including a considered overview of other relevant plans and policies that relate to sustainability, and a baseline assessment of the characteristics of the borough.
June – August 2023	Regulation 18 First Draft Plan Consultation Contains a draft spatial strategy, site allocations and policies to guide future development. It has been informed by evidence documents, ongoing Duty-to-Cooperate discussions and the responses to the Issues and Strategic Options document.	Regulation 18 SA Report (this report) This SA Report presents the assessment of three housing growth options, three employment growth options, six growth direction options, 141 reasonable alternative sites and 15 draft strategic policies.

1.9 Scoping Report

1.9.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report was produced by NuLBC in May 2021.

1.9.2 The SA Scoping Report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.9.3 The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency. 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 this Regulation 18 SA Report.

²⁰ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report> [Date accessed: 14/04/23]

1.9.4 **Table 1.2** summarises the consultation responses received relating to the SA Scoping Report, and how these comments have been incorporated into the SA process. Comments relating to recommended policy approaches or considerations for the Local Plan team have not been reproduced; all draft Local Plan policies have been assessed in this SA Report based on their likely effects on each of the Objectives of the SA Framework (see full policy assessments in **Appendix E**, and overview in **Chapter 6**).

Table 1.2: Consultation responses from statutory consultees on SA Scoping Report (August 2021)

Consultee	Summary of Consultation response	Incorporation into the SA
Environment Agency (EA)	<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).
EA	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 C).
EA	<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 NetworkMap.</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 C).</p>
EA	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 C).
EA	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	Waste is considered within SA Objective 4 (see Appendix A).

Consultee	Summary of Consultation response	Incorporation into the SA
	<p>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>	
Historic England (HE)	<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).
HE	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).
HE	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).
HE	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 2 , 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.
HE	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).
HE	We recommend that objective 8 also relates to historic landscapes and townscape 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 response	Incorporation into the SA
HE	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 SA includes consideration of how identified adverse impacts could be avoided or mitigated in Chapter 7 where draft local policies are used for post-mitigation in relation to SA Objectives.
HE	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 (NE)	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).
NE	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).
NE	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 Habitats sites and SSSIs are considered through SA Objective 3 alongside other biodiversity designations.
NE	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: <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. Green infrastructure: <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. 	The suggested indicators have been incorporated into the SA Framework (see Appendix A) where appropriate.

Consultee	Summary of Consultation response	Incorporation into the SA
	Soil: <ul style="list-style-type: none"> The amount of soil sealed. 	

1.10 Signposting for this report

1.10.1 This Regulation 18 SA Report sets out an assessment of reasonable alternatives (or ‘options’) identified by NuLBC, and draft policies as set out in the Newcastle-under-Lyme ‘First Draft Plan’ document.

1.10.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of this SA Report are listed below:

- **VOLUME 1: Non-Technical Summary (NTS)** provides a summary of the Regulation 18 SA work.
- **VOLUME 2: Main Regulation 18 SA Report (this document)**
 - **Chapter 1** sets out the purpose, context and introduction to the Local Plan and the accompanying SA process.
 - **Chapter 2** sets out the methodology used to present and assess the findings of the SA process.
 - **Chapter 3** presents the assessment of the housing growth options.
 - **Chapter 4** presents the assessment of the employment growth options.
 - **Chapter 5** presents the assessment of the growth direction options.
 - **Chapter 6** summarises the SA findings in relation to the assessment of draft policies.
 - **Chapter 7** summarises the SA findings in relation to the assessment of reasonable alternative sites and presents selection and rejection information.
 - **Chapter 8** sets out the conclusions of this Regulation 18 SA, and outlines the next steps.
- **VOLUME 3: Appendices**
 - **Appendix A** presents the SA Framework.
 - **Appendix B** presents the PPP Review.
 - **Appendix C** presents the topic-specific methodology used to assess reasonable alternative sites.
 - **Appendix D** presents the assessment of reasonable alternative sites.
 - **Appendix E** presents the assessment of draft policies.
 - **Appendix F** presents the EqlA screening of each draft policy.

2 Assessment Methodology and Scope of Appraisal

2.1 SA Framework

- 2.1.1 Each of the reasonable alternatives, options and policies appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework.
- 2.1.2 The previous SA Objectives as set out in the SA Scoping Report²¹ have been reviewed and consolidated to ensure that they are streamlined, concentrate on meaningful evaluation and provide a greater focus on the topics as set out in the SEA Regulations (biodiversity, flora, fauna, air, climatic factors, cultural heritage, human health, landscape, material assets, population, soil and water).
- 2.1.3 The SA Framework is presented in its entirety in **Appendix A**, including decision-making criteria and suggested indicators.
- 2.1.4 **Table 2.1** summarises the SA Objectives and their relevance to the SEA themes, and indicates how each of the 20 SA Objectives proposed at the Scoping stage have been incorporated into the 12 revised SA Objectives.

Table 2.1: Summary of SA Objectives and changes since the Scoping stage

No.	SA Objective	Relevance to SEA Regulations	Incorporating draft objectives from the SA Scoping Report
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	1. To contribute to the reduction of greenhouse gases and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment.
2	Air: To improve air quality, creating cleaner and healthier air.	Air	2. To improve air quality, creating cleaner and healthier 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	3. To ensure that there is an overall net gain in the extent and quality of biodiversity.
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	4. To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources. 9. To ensure the efficient use of mineral resources, including the recycling and reuse of existing materials where possible in order to limit the use of primary aggregates and to safeguard their supply. 11. Encourage schemes that contribute to self-sufficiency in waste treatment and encourage local communities to take

²¹ Newcastle-under-Lyme Borough Council (2021) Newcastle-under-Lyme Local Plan Sustainability Appraisal Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/516/sustainability-scoping-report>
[Date accessed: 14/04/23]

No.	SA Objective	Relevance to SEA Regulations	Incorporating draft objectives from the SA Scoping Report
			responsibility for the waste that they generate.
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	5. To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems.
6	Water: To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive.	Water	6. To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive.
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	7. To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings.
8	Landscape: To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.	Landscape	8. To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.
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. Maintain and enhance the quality, accessibility and connectivity of open space and blue and green infrastructure. 13. To increase life expectancy and improve the health and mental well-being of the population overall.
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	12. To provide housing choice and help meet the housing needs of the whole community 14. To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, and access to public transport are available to all sectors of the population with particular emphasis on deprived neighbourhoods. 15. Reduce crime and the fear of crime.
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	16. To reduce the need to travel while increasing transport choice and accessibility for all. 20. To provide a safe, efficient transport network and increase the use of public transport, cycling and walking.
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	17. To enable access to the widest range possible of shopping and commercial services for the resident population. 18. To provide a range of employment land and premises that meets the needs of the business community and tackles socio- economic inequalities within the population. 19. To protect and enhance the vitality and viability of the strategic, town, borough, neighbourhood and rural centres within the urban and village areas.

- 2.1.5 The SA Framework is comprised of SA Objectives and decision-making criteria (see **Appendix A**). Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations²². Including the SEA topics in the SA Objectives helps to ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 2.1.6 It is important to note that 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, sites and options.

2.2 Assessment of Reasonable Alternatives

- 2.2.1 The purpose of this document is to provide an appraisal of reasonable alternatives, also known as 'options', in line with Regulation 12 of the SEA Regulations²³:
- 2.2.2 *"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".*
- 2.2.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 2.1**).

Box 2.1: Schedule 1 of the SEA Regulations²⁴

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 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).

²² 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)."

²³ 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: 14/04/23]

²⁴ 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: 14/04/23]

Box 2.1: Schedule 1 of the SEA Regulations²⁴

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

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.

2.3 Impact assessment and determination of significance

2.3.1 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.

2.4 Sensitivity

2.4.1 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.

2.4.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

Table 2.2: 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.

2.5 Magnitude

2.5.1 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 2.3**).

Table 2.3: 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	<p>Partial loss/alteration/improvement to one or more key features; or</p> <p>The impact is one of the following:</p> <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	<p>Minor loss/alteration/improvement to one or more key features of the receptor; or</p> <p>The impact is one of the following:</p> <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

2.6 Significant effects

2.6.1 A single value from **Table 2.4** 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.

2.6.2 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: “*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 2.4: 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

Significance	Definition (not necessarily exhaustive)
	<ul style="list-style-type: none"> 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.

- 2.6.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle²⁵ 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.
- 2.6.4 For the assessment of reasonable alternative sites, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full assessments presented in the SA report appendices have been set out per 'receptor'. The full methodology used to assess reasonable alternative sites throughout the SA process, which sets out the receptors considered for each SA Objective, is presented in **Appendix C**.
- 2.6.5 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).
- 2.6.6 The level of effect has been categorised as minor or major. 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.

²⁵ 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".

2.6.7 Each reasonable alternative or option 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 2.4**. Likely impacts are not intended to be summed.

2.6.8 It is important to note that the assessment scores presented in **Table 2.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives, of particular relevance for the site assessments (see **Appendix C**), offering further insight into how each significant effect score was determined. These should be borne in mind when considering the assessment findings.

2.7 Limitations of predicting effects

2.7.1 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.

2.7.2 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.

2.7.3 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.

2.7.4 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 Newcastle-under-Lyme Local Plan is also limited in its assessment of GHG emissions, and greater detail of carbon footprint data for example would help to better quantify effects.

2.7.5 All data used is secondary data obtained from the Council or freely available on the Internet.

2.8 Methodology for assessment of growth options and draft policies

2.8.1 The appraisal of housing and employment growth options, growth direction options and draft policies aims to assess the likely significant effects of each proposed option, based on the criteria set out in the SEA Regulations (see **Box 2.1**).

2.8.2 **Table 2.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

Table 2.5: Presenting likely impacts

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 effect on the 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.	--

2.8.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distill the wide-ranging effects of a broad growth option into one overall impact.

3 Assessment of Housing Growth Options

3.1 Preface

- 3.1.1 Paragraph 61 of the NPPF (2021) 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 outlined in PPG²⁶, unless the local authority feel that circumstances warrant an alternative approach.
- 3.1.2 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*”.
- 3.1.3 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)²⁷ has been updated. Likewise a Housing and Economic Needs Assessment Update for Newcastle-under-Lyme in March 2023²⁸ has also been prepared.
- 3.1.4 According to the Housing and Economic Needs Assessment Update (2023), as of 2022, the housing need figure for Newcastle-under-Lyme is 358 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 7,160 homes.
- 3.1.5 However, the Council has identified two further reasonable alternative housing numbers for consideration alongside the standard method figure, based on different modelled employment forecasts as set out in the Housing and Economic Needs Assessment Update.
- 3.1.6 Three reasonable alternative options for the quanta of housing growth have been identified by NuLBC (see **Table 3.1**).

Table 3.1: Newcastle-under-Lyme Housing Growth Options identified by NuLBC

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

²⁶ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 19/04/23]

²⁷ 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: 25/04/23]

²⁸ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

3.1.7 **Table 3.2** summarises the likely impacts of each housing growth option in relation to the 12 SA Objectives. The text within **section 3.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

3.1.8 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.

Table 3.2: Impact matrix of the three 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	--	-	-	-	+/-	-	+/-	-	-	++	-	+

3.2 Assessment

SA Objective 1 – Climate Change

3.2.1 Residential buildings represent the second highest source of GHG emissions forming 27% of the total emissions in Newcastle-under-Lyme behind road transport²⁹. The proposed new development options would all be likely to increase CO₂ 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 the most, followed by Option 1. All options could therefore lead to a major negative impacts for this objective in the short and medium term. Option 2 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 2 is the best performing option for this SA Objective.

²⁹ 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: 05/05-23]

SA Objective 2 – Air

- 3.2.2 The largest single source of emissions is associated with burning of petrol and diesel, which is primarily used for road transport. Of this, some 45% of emissions come from motorways crossing the region³⁰. Four AQMAs have been declared in the borough due to exceedances in NO₂. Option 2 would create the fewest number of new homes and so potentially the fewest number of additional journeys; therefore, this option would likely be the best performing under air quality considerations. Conversely, Option 3 would create the most new dwellings and so potentially the highest number of new journeys, followed closely by Option 1. 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.

SA Objective 3 – Biodiversity, Flora and Fauna

- 3.2.3 The borough contains a range of biodiversity designations and features including SSSIs, LNRs and Ramsar sites, 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 options may 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. As Option 2 proposes the least number of houses it could potentially have a lesser impact than Options 1 and 3.

SA Objective 4 – Natural Resources & Waste

- 3.2.4 The majority of the land within Newcastle-under-Lyme borough is classified as ALC Grade 3, although there are small pockets of Grade 2 land in the south. Development within the urban area would not result in loss of BMV 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. MSAs are present across a large proportion of the borough and development within these areas would potentially lead to sterilisation of mineral resources. As Option 2 proposes the fewest number of new dwellings it may cause the least added pressure to mineral and soil resources.
- 3.2.5 All three Options would likely increase household waste production, leading to a minor negative impact; however, Option 2 would likely be the best performing option as it proposes the fewest number of dwellings and correspondingly the smallest increase in waste production.

³⁰ 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 05/05/23]

SA Objective 5 – Flooding

- 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/Newcastle; there are an estimated 632 properties in Newcastle and Silverdale at risk of surface water flooding³¹. Cross-boundary flood impacts are an important consideration in Newcastle-under-Lyme borough, particularly with regard to fluvial and surface water flooding.
- 3.2.7 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 sources of flood risk. Building new dwellings can exacerbate flood risk owing to the introduction of hardstanding but implementation of adaptive technologies can mitigate for this depending on the site-specific circumstances. Option 2 proposes fewer houses and so may potentially have less of an impact of flooding than Options 1 and 3; however, overall, the impact of all options is uncertain.

SA Objective 6 – Water

- 3.2.8 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 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 2 would have a smaller resource requirement and potentially a lesser impact on water quality than Options 1 and 3 owing to fewer dwellings being built.

SA Objective 7 – Cultural Heritage

- 3.2.9 There are 365 Listed Buildings, 13 SMs, 2 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. 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.

³¹ 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> [Accessed 05/05/23]

SA Objective 8 – Landscape

- 3.2.10 Outside of the main urban areas the borough is dominated by undulating rural landscapes. A proportion of the borough is located within the Stoke-on-Trent Green Belt, which covers the entire northern half of the borough. Development within these areas could harm the purposes of the Green Belt. The landscape character of the borough is described in the Landscape and Settlement Character Assessment (LSCA)³² as being of moderate or good condition and moderate or strong strength of 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 options is not known at this time, it is likely that all options would result in the need to develop outside of existing development boundaries to some extent, leading to a minor negative impact on the landscape. Option 2 proposes to build the fewest number of houses 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

- 3.2.11 Across the borough, health services are fairly well distributed with various GP Surgeries within the urban area of Newcastle-under-Lyme and the majority of outlying villages having 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 south³³. New development may put pressure on existing health services and could potentially lead to capacity issues if high density developments within existing urban settings are built. This could also put pressure on urban green spaces with 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 currently known. Overall, Option 2 proposes the fewest new houses and as such would place the least pressure on existing healthcare provisions, Options 1 and 3 have larger numbers of proposed dwellings placing the most pressure on existing provisions and may require additional resources to be delivered.

³² 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]

³³ 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: 05/05/23]

SA Objective 10 – Equality

- 3.2.12 IMD data shows the most deprived areas within the borough are centred around 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.
- 3.2.13 However, all three housing options would meet the housing needs of the local area, leading to positive effects on this SA Objective overall. Since Options 1 and 3 would both meet or exceed the locally identified need, they may provide the most housing choice, leading to a greater range of housing than Option 2 to meet the varied needs of the population. A major positive impact could be achieved for Options 1 and 3, and a minor positive impact for Option 2.

SA Objective 11 – Transport & Accessibility

- 3.2.14 The borough benefits from having the M6 motorway to provide links with other major settlements, however there is only one train station and public satisfaction with travel information is low³⁴. 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 Option 1 and 3 would create a higher burden on the existing transport network due to the higher number of new dwellings, however there may be potential within these options to provide new public transport links producing a benefit in the local area.

³⁴ 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 05/05/23]

SA Objective 12 – Economy

- 3.2.15 It is expected that accessibility of 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. As Option 2 proposes the fewest number of houses it is possible that these dwellings could be centred around existing infrastructure and amenities to a greater extent than Options 1 and 3. Although, overall, all options could lead to a minor positive impact for this objective.

3.3 Conclusion

- 3.3.1 As would be expected, a larger number of proposed dwellings would be more likely to lead to adverse effects particularly on environmental focused SA Objectives. Option 2 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 (SA Objective 10) as it exceeds the housing need, but this larger housing number performs less well against the environmental objectives.
- 3.3.2 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.

3.4 Selection and rejection

- 3.4.1 The Council has identified 'Option 1' to be taken forward as it has been informed by a local housing needs assessment, conducted using the standard method. The figure is considered to be aligned with economic jobs growth forecasts and represents the most deliverable option when balanced against site opportunities and constraints in the borough.

4 Assessment of Employment Growth Options

4.1 Preface

- 4.1.1 Paragraph 81 of the NPPF 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*”³⁵.
- 4.1.2 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. Following the ending of work on the Joint Local Plan, the previous Joint Economic Needs Assessment (2020)³⁶ has been updated and the Housing and Economic Needs Assessment for Newcastle-under-Lyme in March 2023³⁷ has been updated.
- 4.1.3 The Economic Needs Assessment (2020) 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. Since 2020, the Housing and Economic Needs Assessment Update (2023) suggests that the land supply is now reduced to 49.9ha, and the updated scenarios indicate a likely requirement for between 36.5ha and 68.8ha of employment land for the updated Local Plan period to 2040.
- 4.1.4 Three reasonable alternative options for the quanta of employment growth have been identified by NuLBC (see **Table 4.1**).

Table 4.1: Newcastle-under-Lyme Employment Growth Options identified by NuLBC

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

- 4.1.5 **Table 4.2** summarises the likely impacts of each employment growth option in relation to the 12 SA Objectives. The text within **section 4.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

³⁵ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 19/04/23]

³⁶ 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: 25/04/23]

³⁷ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

- 4.1.6 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.

Table 4.2: 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	+	-	++

4.2 Assessment

SA Objective 1 – Climate Change

- 4.2.1 All three 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.

SA Objective 2 – Air

- 4.2.2 The largest single source of emissions is associated with burning of petrol and diesel, which is primarily used for road transport, of this 45% of emissions come from motorways crossing the region³⁸. Four AQMAs have been 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.

³⁸ 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 05/05/23]

SA Objective 3 – Biodiversity, Flora and Fauna

- 4.2.3 The borough contains SSSIs, LNRs and Ramsar sites, 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, with potential to result in a minor negative impact on biodiversity.

SA Objective 4 – Natural Resources & Waste

- 4.2.4 The majority of the land within Newcastle-under-Lyme borough is classified as ALC Grade 3, although there are small pockets of Grade 2 land in the south of the region. Development within the urban area would not result in loss of BMV land, however, as the location of the proposed developments in the three options is not currently known their impact on BMV land is uncertain. MSAs are present across the borough, and development within these would increase the pressure exerted on mineral resources. All three options have the same supply figure and a need of up to 68.8ha of employment land, but the location and nature of the sites under each option is unknown at this stage. These options are anticipated to produce a negative impact overall, owing to the probable use of previously undeveloped land to some extent.

SA Objective 5 – Flooding

- 4.2.5 Historic flooding records highlight the risk from the Lyme Brook, culverted watercourses and surface water; the areas most affected have been Kidsgrove and Silverdale/Newcastle³⁹. Since employment development locations are not known, it is not clear what effect each 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 new development can increase the risk of flooding under either of the three options, so the impact on flooding is uncertain.

SA Objective 6 – Water

- 4.2.6 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 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 unless it is possible to demonstrate water neutrality principles.

³⁹ 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> [Accessed 05/05/23]

SA Objective 7 – Cultural Heritage

- 4.2.7 There are 365 Listed Buildings, 13 SMs, 2 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 to receptors is unknown, the potential impacts of the three employment growth options on cultural heritage features is uncertain.

SA Objective 8 – Landscape

- 4.2.8 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 development boundaries to some extent, leading to potential for a minor negative impact on the landscape overall.

SA Objective 9 – Health & Wellbeing

- 4.2.9 The development locations for the three employment growth options are not known but it is not expected to 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

- 4.2.10 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 facilitate social inclusion by increasing the accessibility to employment opportunities, however, this 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

- 4.2.11 Transport is an enabler of economic activity; employment sites close to or within existing urban settlements would have a greater transport network to access in comparison to more rural developments. The ONS 2020 data shows private cars were the most used mode of transport to travel to work⁴⁰. Urban developments may have better access to existing public transport links or active travel routes 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.

⁴⁰ 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: 17/05/23]

SA Objective 12 – Economy

- 4.2.12 It would be 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.

4.3 Conclusion

- 4.3.1 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.

4.4 Selection and rejection

- 4.4.1 The Council has identified 'Option 1' to be taken forward as the level of jobs and economic growth is considered to align with the outcomes of the local housing need assessment conducted using the standard method. It represents the most deliverable option to support economic growth but balanced against site opportunities and constraints within the borough.

5 Assessment of Growth Direction Options

5.1 Preface

5.1.1 Spatial options are intrinsically linked to the housing and employment growth options for Newcastle-under-Lyme detailed in the preceding chapters. The spatial strategy will dictate where the new growth would be allocated in Newcastle-under-Lyme for the Plan period to 2040.

5.1.2 As outlined in the Issues and Strategic Options document⁴¹, NuLBC intend to broadly align the spatial strategy with the hierarchy of centres, in line with the level of services and infrastructure provision. However, a number of constraints are present within the borough, including the presence of the Green Belt, which limit the options in terms of the potential for the higher-tier centres to accommodate large proportions of growth.

5.1.3 The Council seek to investigate all potential sources for sites in the following order of preference, in line with national guidance:

- Brownfield, under-utilised or undeveloped land within development boundaries;
- Optimising density of development sites;
- Consider exporting a proportion of housing to neighbouring authorities; and
- Consider the release of Green Belt land.

5.1.4 Given the challenges in identifying sufficient land for significant growth within the development boundaries, the Council have suggested that it may be necessary 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.

5.1.5 Six Growth Direction Options have been identified by Newcastle-under-Lyme borough Council. Options 1-5 are presented in **Table 5.1** and shown on **Figure 5.1**. Option 6 is not shown on the figure as this would see dispersed development across a number of strategic sites.

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: 14/04/23]



© Lepus Consulting for Newcastle-under-Lyme Borough Council

Table 5.1: Newcastle-under-Lyme Growth Direction Options identified by NuLBC

Growth Direction Option	Description of Growth Direction Option
Growth Direction 1	Development on strategic sites outside the Green Belt – Large rural extensions
Growth Direction 2	Strategic Green Belt release for an urban extension – University Growth Corridor
Growth Direction 3	Green Belt release for development of strategic sites – Talke and Chesterton expansion
Growth Direction 4	Green Belt release for development of strategic sites – Kidsgrove expansion
Growth Direction 5	Green Belt release for development of strategic sites – Audley Rural expansion
Growth Direction 6	Combination of strategic sites across the borough comprising of both sites outside the Green Belt and sites which require Green Belt release

5.1.6 Each option has been assessed using the SA Framework and summary findings are presented in **Table 5.2**. Full explanations and reasonings behind each score are set out for each SA Objective in **section 5.2**.

5.1.7 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.

Table 5.2: 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
1	--	--	-	--	-	-	-	+	-	-	-	-
2	+	+/-	-	-	0	-	-	--	+	+	+	+
3	-	-	+/-	+	0	-	-	--	+	+	+/-	+
4	-	+/-	-	+	0	-	-	--	+	+	+	+
5	--	-	-	-	-	-	-	--	-	-	-	-
6	-	-	-	+/-	+/-	-	+/-	-	-	+/-	+/-	+/-

5.2 Assessment

SA Objective 1 – Climate Change

- 5.2.1 All options would lead to a similar overall level of growth with potential to cause an increase in GHGs during the construction and occupation of development, to some extent. Options 1 and 5 are rural-based options, which may have a negative impact on climate change as they would encourage the use of private vehicles for travel and so potentially increase GHG emissions, contributing towards the causes of climate change to a greater extent. Option 6, includes a significant rural-based dimension, and will inevitably increase movement around the borough. The impact of development will depend on available public transport and active travel opportunities; a minor negative impact is anticipated.
- 5.2.2 Options 2, 3 and 4 may be able to utilise or enhance existing public transport networks so potentially contributing less to GHG emissions. Option 2 in particular would be likely to have the greatest opportunity to utilise university-led renewable energy projects in adjacent development sites, with potential to achieve a minor positive impact on climate change. Option 2 is the best performing option.

SA Objective 2 – Air

- 5.2.3 Option 1 would concentrate development in the southwestern rural edge of the borough, Option 5 would focus growth within rural villages around Audley, and Option 6 would also encompass dispersed rural sites. Growth under Options 5 and 6 is likely to be outside the AQMAs, but due to the rural nature of the area would likely increase reliance private car usage potentially increasing air pollution levels and having a negative effect on local air quality. Option 1 would site a proportion of growth around Madeley, in proximity to 'AQMA Number 4 – Little Madeley', with potential to exacerbate existing poor air quality in this area leading to a major negative impact.
- 5.2.4 Option 2 would site development close to Keele University and Newcastle-under-Lyme town centre; this option could utilise or enhance existing public transport options reducing the reliance on private cars so potentially reducing air pollution. The university also has sustainable transport projects in adjacent development sites which could be incorporated or further developed. However, with a large number of new dwellings or employment sites will inevitably come with a certain number of private cars, which could increase congestion along key transport routes including Keele Road. As this option is closest to the town centre, and provides opportunities to incorporate sustainable transport, it is likely to perform the best in terms of air quality.
- 5.2.5 Under Option 3 development would be relatively well connected to public transport routes being just outside the urban area, however existing congestion issues and therefore pollution levels at the A34/A500 junction could be made worse by development in this area creating a minor negative effect on air quality.

5.2.6 Option 4 is close to and could have a negative impact upon the Liverpool Road Kidsgrove AQMA, this AQMA has shown no clear trend and has not achieved five years below 10% of the UK objective⁴³. However, there would be good accessibility to public transport including the railway station in Kidsgrove, so potentially reducing reliance on private cars and therefore pollution. Mixed effects would be likely for Option 4.

5.2.7 The best performing options for air quality are likely to be options 2 and 4.

SA Objective 3 – Biodiversity, Flora and Fauna

5.2.8 The borough contains SSSIs, LNRs, SBIs and Ramsar sites, as well as areas of low, medium and high habitat distinctiveness throughout the borough. There are priority woodland, grassland, marsh and heathland habitats as well as pockets of ancient woodland within the borough. Developing on previously undeveloped would be likely to have a negative impact on biodiversity as it reduces the provision of habitats and causes fragmentation of ecological networks, and may put pressure on the range of biodiversity designations across the borough.

5.2.9 Option 1 does not include any Green Belt release but does still build on undeveloped land, which would be expected to have a negative impact on biodiversity as habitats could be lost. Options 2, 4, 5 and 6 would also be likely to have a negative impact on biodiversity as previously undeveloped land would be used, including within the Green Belt.

5.2.10 Option 3 uses land which historically was a landfill site and may therefore have less ecological value than undeveloped sites. Although, several designations can be found in the area surrounding Talke, including Bathpool Park LNR.

5.2.11 An increased population may cause an indirect adverse effect on biodiversity sites by increased pressure from visitors or potential pollution, which could be potentially affected in some way by each of the six options. Overall, there is potential for a minor negative impact on biodiversity under all options however Option 3 is likely to have least adverse effects.

SA Objective 4 – Natural Resources & Waste

5.2.12 Development which coincides with ALC Grade 1, 2, and potentially Grade 3 land, would risk losing some of the borough's BMV agricultural land. Development which coincides with MSAs could potentially lead to the sterilisation of mineral resources and prevent their future extraction.

5.2.13 Option 1 focuses development in the southwestern edge of the borough, where there are several MSAs and the agricultural land is mostly ALC Grade 3 although there are pockets of Grade 2 land.

5.2.14 Option 2 would potentially have small overlap with MSAs and would be primarily using ALC Grade 3 land for development.

⁴³ Newcastle-under-Lyme Borough Council (2022) 2021 Air Quality Annual Status Report Draft. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/476/air-quality-report-and-summary-2021> [Date Accessed: 17/05/2023]

- 5.2.15 Option 3 is within MSAs, but would utilise Grade 4 ALC land (poor quality agricultural land). There is also potential for this land to be contaminated due to former industrial uses and historic landfill sites, and so development under Option 3 may provide the greatest opportunities for the efficient use of land and remediation of ground contaminants.
- 5.2.16 Option 4 and 5 are within MSAs, there are historic landfills in the area, with potential for benefits to natural resources should any contaminated land be remediated prior to development. For Option 4 the land is classed as urban or Grade 4 ALC and Option 5 has Grade 3 land. As Option 6 covers the majority of the borough it is unclear exactly what impact it would have on natural resources, but it is likely to encompass areas of mineral safeguarding, ALC Grade 3 land and potentially contaminated land from historic landfill sites.
- 5.2.17 All options would be likely to increase pressure on the borough's natural resources, including previously undeveloped land, however Options 3 and 4 include opportunities to re-use previously developed land and therefore perform better than other options.

SA Objective 5 – Flooding

- 5.2.18 Historic flooding records highlight the risk from the Lyme Brook, culverted watercourses and surface water, the areas most effected have been Kidsgrove and Silverdale/Newcastle⁴⁴. Building new dwellings can affect surface water flooding but implementation of adaptive technologies can mitigate for this.
- 5.2.19 There is potential for Options 1 and 5 to be affected by Fluvial Flood Zones 2 and 3, given their location with respect to areas of flood risk particularly around Madeley, as well as surface water flooding and so these options could produce a negative effect. Options 2, 3 and 4 are likely to direct development further away from fluvial flood risk but could also lead to a negative effect as they could also be affected by surface water flooding; however it is assumed that SuDs mitigation will help neutralise this impact. Some development within Option 6 could be affected by Flood Zones 2 and 3 as well as surface water flooding but as it is unknown which sites will be included in this option, the details of how this option could be affected by flooding is uncertain.

SA Objective 6 – Water

- 5.2.20 New development sites will require water and wastewater provision, this could potentially be incorporated into the existing infrastructure, but would also increase demand and potentially require upgraded capacity in certain areas. NuLBC undertook a Water Cycle Study⁴⁵, which indicated it would be likely that there would be available water supply capacity to accommodate new development in the area based on proposed growth figures in 2020, however, there were wastewater treatment sites which would require upgrades to enable the wastewater from the additional developments to be treated.

⁴⁴ 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> [Accessed 05/05/23]

⁴⁵ JBA Consulting (2020) Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study: Phase 1. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/276/water-cycle-study-2020> [Date Accessed: 17/5/2023]

5.2.21 Options 1, 5 and potentially 6 (depending on the sites used) could have an adverse effect on groundwater SPZs as the areas proposed for these three options lie within SPZ 3. Options 2, 3 and 4 are unlikely to have any direct impact on SPZs.

5.2.22 In the Water Cycle Study, only two of the 10 watercourses within the borough have a 'good' Water Framework Directive (WFD) status and the others are classified as either 'moderate', 'poor' or 'bad'. The main reasons for these classifications are sewage discharge, and diffuse pollution from urbanisation and agriculture. There is potential for increased discharges from wastewater treatment works due to the proposed developments which could impact downstream water quality of the receiving water bodies, as a result of large-scale growth under any of the six options. It is difficult to identify a best performing option under this SA Objective.

SA Objective 7 – Cultural Heritage

5.2.23 There are 365 Listed Buildings, 13 SMs, 2 RPGs and 21 conservation areas in Newcastle-under-Lyme, in addition to a range of non-designated historic features. These designated and non-designated cultural heritage assets are scattered throughout the borough, and it is likely that some development would be located in close proximity to these assets under any growth direction option, with potential for adverse effects.

5.2.24 Option 1 may impact the setting of listed buildings, conservation areas and RPGs near to the rural villages in the south west. Option 2 focuses development within the university growth corridor, with potential adverse effects on the setting of the adjacent Keele Hall RPG and other nearby heritage assets. Option 3 may impact listed buildings, in particular the Grade II Listed Wedgewood Monument, and Talke Conservation Area. Option 5 also has potential to impact the Wedgewood Monument as well as other listed buildings and Audley Conservation Area. There are listed buildings and a conservation area in Kidsgrove, and so Option 4 would have potential to adversely affect the setting of these heritage assets. Option 6 could have potential heritage impacts depending on the location of the sites included in the development, but as locations are not known at this stage Option 6's impact on heritage sites is uncertain. It is difficult to identify a best performing option under this SA Objective.

SA Objective 8 – Landscape

5.2.25 Outside of the main urban areas the borough is dominated by undulating rural landscapes. The Green Belt covers the entire northern half of the borough, there are also several landscape character areas which are described in the LSCA as being of moderate or good condition and moderate or strong strength of character⁴⁶. The sensitivity of the settlement fringes was also assessed and across the Newcastle-under-Lyme Borough the sensitivity was classed as medium or high sensitivity.

⁴⁶ 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]

- 5.2.26 Option 1 is the only option which does not require any Green Belt release and would prevent urban sprawl from Newcastle-under-Lyme or Kidsgrove and help to maintain their separation. Whilst not within Green Belt, the developments under Option 1 would be located within rural areas and potentially close to Green Belt and as such may have a negative impact on the openness of the landscape, as well as the character of the rural villages.
- 5.2.27 Option 2 would require building on previously undeveloped open fields within the Green Belt. The area in which development under Option 3 would sit is predominantly agricultural land; this option would lead to loss of Green Belt land and would contribute to urban sprawl potentially resulting in the coalescence of Talke and Chesterton. These options would likely cause an adverse effect on the openness of the Green Belt and on the character and identity of these settlements.
- 5.2.28 Option 4 would also potentially create issues with urban sprawl as well as harm to the openness of the Green Belt, as development would possibly be close to the borough boundary and so have impacts across the boundary. Sprawl between villages would also be a potential concern in Option 5 as well as loss of Green Belt land. Option 6 would provide opportunity to focus development across the borough on sites which make a weaker contribution to the purposes of the Green Belt, but would still potentially have a negative effect on the openness of the landscape.
- 5.2.29 Overall, all options would be likely to result in a minor negative impact on the landscape, although Option 6 would likely be the best performing as the development would be dispersed across the borough so may have smaller impact in each area compared to larger developments focused on one area, and the sites chosen under Option 6 would be those that make a weaker contribution to the Green Belt purposes. Option 1 is likely to be the best performing option.

SA Objective 9 – Health & Wellbeing

- 5.2.30 Across the borough health services are fairly well represented by GP Surgeries with various surgeries distributed within the urban area of Newcastle-under-Lyme and the majority of outlying villages having a GP Surgery. Development under Options 2, 3 and 4 is likely to be within easy access of existing health services since these options focus on urban extensions, whereas for Options 1 and 6 existing health services are less likely to be in close proximity to some development allocations. Option 5 focuses growth around Audley where there is only one GP surgery, with potential adverse implications for the capacity of this healthcare service.
- 5.2.31 There may be reduced access to green space for Options 1, 4 and 5 and what greenspace there is may be under greater pressure from increased usage due to development. However, whilst Options 1, 2, 5 and 6 use Green Belt or rural land this may give residents easier access to nature and the countryside as it would be closer than Options 3 and 4 which are more urban.

- 5.2.32 There is potential within the options to enhance local infrastructure, improving public transport links and access to health facilities and local greenspace. Overall, it is likely that the different options would put pressure on existing health services and green spaces to different extents depending on their specific location. On balance, Options 2, 3 and 4 are considered to have most potential to achieve a minor positive impact on health due to their location close to existing healthcare provisions, and Options 1, 5 and 6 would be more likely to lead to overall adverse effects overall. Option 2 may have the most health benefits in terms of residents being close to existing services within Newcastle-under-Lyme and close to open countryside and greenspace.

SA Objective 10 – Equality

- 5.2.33 The more rural areas tend to have a lower IMD score than urban areas, as such, Options 1 and 2 which are likely to direct new development towards areas which have lower levels of deprivation. It is difficult to predict the impact of Option 6 due to the lack of certainty in growth location and scale. Options 3, 4 and 5 would direct development towards locations with higher scores indicating higher levels of deprivation due to being closer to the urban areas. Despite the indicative levels of deprivation, being closer to the urban areas can mean developments are closer to existing infrastructure such as public transport, local services and employment opportunities. The more rural developments would increase the reliance on private cars, but if access to a car was not available this could increase inequalities in these areas and create more isolated communities.
- 5.2.34 It is difficult to predict the effect of directing growth to locations on equality without more information regarding the nature, design and layout of the proposed development. However, in terms of the potential of each option to provide sustainable and accessible communities, at this stage it is considered that Options 2, 3 and 4 are most likely to lead to minor positive impacts overall, Options 1 and 5 have more potential to lead to a minor negative impact and Option 6's impact is uncertain.

SA Objective 11 – Transport & Accessibility

- 5.2.35 Option 1 focuses growth on the southwestern part of the borough, where transport links are less extensive than areas closer to the town of Newcastle-under-Lyme. This would be likely to increase reliance on private cars to access services and employment sites, potentially increasing congestion and pollution in the area. Similarly, Option 5 is more rural so whilst there are public transport links in some areas, reliance on private cars would likely increase. This could potentially lead to congestion on the main roads back into Newcastle as residents commute to employment sites. A minor negative impact on transport and accessibility would be likely under Options 1 and 5.
- 5.2.36 Option 6 also could potentially increase the reliance on private cars but due to uncertainty about the potential distribution of new development across the borough, the impact of growth direction is unknown in terms of accessibility to local services, schools and employment sites.

- 5.2.37 Option 2 is the closest option to Newcastle-under-Lyme town centre and there may be opportunities to utilise and enhance existing public transport links. The university also has sustainable transport projects in adjacent development sites which could be incorporated or further developed. However, with a large number of new dwellings or employment sites will inevitably come more private cars, which could increase congestion along key transport routes including Keele Road.
- 5.2.38 Option 3 would provide good public transport links, and be within reach of the train station in Kidsgrove, potentially helping to lower reliance on private cars. However, there is also potential to increase congestion in this area as the option would direct new development close to the A43/A500 junction leading to an uncertain impact overall. Option 4 would be able to utilise the public transport links within Kidsgrove allowing for more sustainable methods of transport than private cars and potentially leading to a minor positive impact on transport and accessibility, and perform the best relative to the other options.

SA Objective 12 – Economy

- 5.2.39 It is expected that Option 1 and 5 would have negative impact on the borough's economy as employment opportunities are not nearby to the proposed location of growth within the small villages in the south west, leading to likely increased commuting out of the area for employment. Impact of pursuing Options 6 is uncertain as it is unknown whether the option would be likely to create the need to commute to employment sites on rural roads.
- 5.2.40 Option 2 would provide close employment opportunities associated with the university growth corridor, as would Option 3 due to its proximity to existing strategic employment areas and potentially Option 4 owing to its focus around Kidsgrove. Options 2, 3 and 4 would be likely to have a minor positive impact on employment and the economy.

5.3 Conclusion

- 5.3.1 It is difficult to determine an overall best performing Growth Direction Option as the performance of each option varies depending on the SA Objective being considered. Often, options which perform better against development and economic needs put the most pressure on environmental resources and social facilities.
- 5.3.2 It is possible to identify best performing options in terms of specific SA Objectives, for example Option 1 is best for landscape and option 3 is best for Biodiversity, Flora and Fauna. However, there is no universal, stand out single best performing option.
- 5.3.3 The summary performance values in **Table 5.2** identify 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. 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.

- 5.3.4 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.

5.4 Selection and rejection

- 5.4.1 The Council has confirmed that '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'.

6 Assessment of Draft Policies

6.1 Preface

- 6.1.1 In light of the Government’s intention to make changes to the planning system through the Levelling Up and Regeneration Bill (LURB)⁴⁷ and proposed updates to the NPPF, and the implications of this for local plan making, the Council has decided to present a focused set of local planning policies at this stage. Later stages of the plan making process will “*build out policies on several development management matters such as, for example, self and custom build, community facilities, amenity policies*”.
- 6.1.2 For the purpose of this Regulation 18 Consultation, NuLBC has identified 23 draft policies for consideration as presented in the Draft Plan document, in addition to a proposed ‘Vision for the Borough’ and set of ‘Strategic Objectives’.
- 6.1.3 The draft policies are listed in **Table 6.1** and fall within the following categories:
- Planning for Sustainable Development (PSD);
 - Climate and Renewable Energy (CRE);
 - Housing (HOU);
 - Employment (EMP);
 - Retail (RET);
 - Infrastructure and Transport (IN); and
 - Sustainable Environment (SE).
- 6.1.4 The sustainability performance of the proposed Vision, Strategic Objectives and each draft policy has been evaluated based on the SA Framework (see **Appendix A**) and the methodology as set out in **Chapter 2**. The assessments are set out in full within **Appendix E**. This chapter summarises the results of these assessments.

Table 6.1: Proposed Draft Plan policies

Policy Reference	Policy Name
PSD1	Overall Development Strategy
PSD2	Settlement Hierarchy
PSD3	Distribution of Development
PSD4	Development Boundaries and the Open Countryside
PSD5	Green Belt and Safeguarded Land
PSD6	Health and Wellbeing
PSD7	Design
CRE1	Climate Change
CRE2	Renewable Energy
HOU1	Affordable Housing
HOU2	Housing Mix, Density and Standards

⁴⁷ UK Parliament (2023) Levelling Up and Regeneration Bill. Available at: <https://bills.parliament.uk/bills/3155> [Date accessed: 05/05/23]

Policy Reference	Policy Name
HOU3	Gypsy, Travellers and Travelling Showpeople
EMP1	Employment
RET1	Retail
IN1	Infrastructure
IN2	Transport and Accessibility
SE1	Pollution, Contamination and Amenity
SE2	Flood Risk, Water Resources and Management
SE3	Water Resources and Water Quality
SE4	Open Space, Sports and Leisure Provision
SE5	Biodiversity and Geodiversity
SE6	Historic Environment
SE7	Landscape

6.2 Overview of policy assessments

- 6.2.1 The impact matrices for all policy assessments are presented in **Table 6.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix E**.
- 6.2.2 The assessment of these 23 policies identified a range of sustainability impacts (see Table 6.2). Several policies identified to have minor or major negative impacts on Climate Change (SA Objective 1), Air (SA Objective 2) and Natural Resources and Waste (SA Objective 4). A large number of “PSD” policies have been identified as having minor or negative impacts on the above objectives.
- 6.2.3 Negligible impacts were identified for SA objectives where the policies seek to mitigate or manage potential adverse impacts as a result of the proposed development; for example, where the policies incorporate conservation and enhancement of heritage assets (SA Objective 7), measures to mitigate flooding and improve water quality (SA Objective 5 and 6) or measures aimed to promote sustainable transport and help produce renewable energy (SA Objective 11 and SA Objective 4), naming a few of those found within the policies.
- 6.2.4 Positive impacts were identified across a number of assessed policies, particularly in relation to socially centred objectives, such as Health and Wellbeing (SA Objective 9), Equality (SA Objective 10), Transport and Accessibility (SA Objective 11), as a result of providing the borough with improved connection to existing facilities and the introduction of new facilities and infrastructure set out in the policies. Although positive impacts on Climate Change (SA Objective 1) were also prevalent across policies, minus policy “PSD1” due to the large influence the policy would have on increasing pollution in the area, scoring the only negative on SA Objective 1 across all policies.

Table 6.2: Summary impact matrix table of strategic policies

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Draft Policy	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	+	+	+	0	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
HOU3	0	0	0	0	0	0	0	0	0	+	+	0
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++
RET1	0	0	0	0	0	0	0	+	+	+	+	+
IN1	+	0	+	+	+	+	0	0	+	+	+	0
IN2	+	+	0	0	0	+	0	+	+	+	++	+
SE1	+	+	+	+	0	+	0	+	+	+	+	0
SE2	+	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
SE6	0	0	0	0	0	0	++	+	0	0	0	+
SE7	+	0	+	0	+	+	+	++	+	0	0	0

7 Assessment of Reasonable Alternative Sites

7.1 Preface

7.1.1 NuLBC have identified a total of 141 reasonable alternative sites for assessment at this stage of the plan making process. This includes:

- 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.

7.1.2 The housing and employment sites have been identified through the Strategic Housing and Employment Land Availability Assessment (SHELAA)⁴⁸. The SHELAA is intended to identify whether or not sites are suitable, available and achievable for housing development, and has assisted the Council in the identification of reasonable alternatives which should undergo SA.

7.1.3 The SHELAA has been developed by:

- An audit of sites in the SHELAA database (July – September 2021);
- Review of responses to the Issues and Options consultation;
- Review of employment need assessment;
- Officer identification of sites;
- Brownfield land register; and
- Brownfield call for sites (October – November 2022).

7.1.4 The SHELAA sites have then been subject to an initial site sift, including a review of site factors including:

- Not available and/or not being actively promoted;
- Have planning permission;
- Are in use (unless clear indication that use will cease);
- Contain showstoppers – for example sites which contain SPA, SAC, Ramsar sites, SSSIs or are in a Functional Floodplain (3b).

7.1.5 This has resulted in a list of reasonable alternatives for housing and employment which will then be the subject of a site selection process, including being informed by the outcomes of the SA.

⁴⁸ Newcastle-under-Lyme Borough Council (2022) Strategic Housing & Employment Land Availability Assessment (SHELAA) Report November 2022. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/544/strategic-housing-and-employment-land-availability-assessment-shelaa-november-2022> [Date accessed: 09/05/23]

- 7.1.6 For Gypsy and Traveller and Travelling Showperson sites, a separate site selection process has been undertaken which has considered site options submitted through the Call for Sites (CfS) process and land in the Council's ownership to determine a set of reasonable alternative sites for consideration in the SA. As for the housing and employment sites, these will then be considered through a site selection report, informed by the findings of the SA process.
- 7.1.7 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 (see **Appendix D**) has discussed sites in the context of their clusters where appropriate.
- 7.1.8 As part of the Regulation 18 Consultation, the Council is exploring the idea of including 'strategic locations' in the emerging Local Plan. These are likely to relate to large-scale sites situated in Green Belt locations. Should the Council consider the potential allocation of any of these sites at a later stage of plan making, they should be tested through the SA.
- 7.1.9 This Regulation 18 SA Report has considered all reasonable alternative sites in the same way using the SA Framework, irrespective of their size or location. At this stage, the assessment has been carried out using red line boundary and site proposal information provided by the Council, as set out in **Table 7.1**. The potential mitigating influence of the draft Local Plan policies is considered within **section 7.3**.
- 7.1.10 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.

Table 7.1: Reasonable alternative sites

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
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
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
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 Shraleybrook Road, Halmerend	Housing	45	N/A
HM8	5.25	Audley	Land West of Heathcote Road, Miles Green	Housing	126	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
HM22	1.66	Audley	Land adj Holly House, Crackley Lane, Scot Hay	Housing	42	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
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
CT25	8.27	Crackley Bank, Red Street, Holditch & Chesterton	Land off Audley Rd, Chesterton	Housing	331	N/A
CH3	3.80	Cross Heath & Knutton	Land at Hoon Avenue, Newcastle	Housing	106	N/A
CH13	0.59	Cross Heath & Knutton	Castletown Grange, Douglas Road, Cross Heath	Housing	-19	N/A
CH14	0.69	Cross Heath & Knutton	Maryhill Day Centre, Wilmott Drive, Cross Heath	Housing	30	N/A
KS3	3.76	Cross Heath & Knutton	Land at Blackbank Road, Knutton (adjacent Knutton Children's Centre)	Housing	150	N/A
KS11	0.57	Cross Heath & Knutton	Knutton Community Centre, High Street Knutton	Housing	9	N/A
KS17	2.33	Cross Heath & Knutton	Knutton Recreation Centre, Knutton Lane	Housing	59	N/A
KS18	0.12	Cross Heath & Knutton	Land North of Lower Milehouse Lane, Knutton	Housing	10	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
KS19	0.08	Cross Heath & Knutton	Knutton Lane	Housing	5	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
KL13	26.13	Keele	Keele Science Park Phase 3, University of Keele	Mixed use	224	11.21
KL14	26.25	Keele	Land South-East of Keele University	Mixed use	56	2.8
KL15	18.05	Keele	Land South of A525 between Keele University and Newcastle	Mixed use	260	13.02
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
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
KG6	0.18	Kidsgrove & Ravenscliffe	William Road, Kidsgrove (site of the Galley PH)	Housing	10	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
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
LW53	8.35	Loggerheads	Land corner of Muckleston Wood	Housing	134	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
			Lane & Rock Lane, Loggerheads			
LW54	9.16	Loggerheads	Land South of Muckleston Road, Loggerheads	Housing	147	N/A
LW81	2.29	Loggerheads	Gravel Bank, Muckleston Road, Loggerheads	Housing	37	N/A
LW82	0.98	Loggerheads	Sewage Works, Market Drayton Road, Loggerheads	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
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
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

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
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 Chorlon 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
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

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
SP2	0.26	Silverdale	Cheddar Drive, Silverdale	Housing	12	N/A
SP11	75.74	Silverdale	Former Keele Municipal Golf Course	Housing	1100	N/A
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
BL3	9.28	Talke & Butt Lane	Land at Slacken Lane, Talke (1)	Housing	107	N/A
BL8	1.42	Talke & Butt Lane	Land adjacent to roundabout at West Avenue, Kids Grove	Mixed use	48	1.21
BL18	13.45	Talke & Butt Lane	Clough Hall Playing Fields, Talke	Housing	285	N/A
BL24	0.27	Talke & Butt Lane	Land adjacent 31 Banbury Street, Talke	Housing	10	N/A
BL32	0.85	Talke & Butt Lane	Land at Congleton Road, Butt Lane	Mixed use	29	0.72
TK6	0.46	Talke & Butt Lane	Site at Coalpit Hill, Talke	Housing	15	N/A
TK10	5.33	Talke & Butt Lane	Land at Crown Bank, Talke	Housing	170	N/A
TK17	1.24	Talke & Butt Lane	Land off St Martins Road, Talke	Housing	42	N/A
TK18	32.51	Talke & Butt Lane	Jamage South, Land North of A500	Mixed use	1040	26.01
TK24	1.38	Talke & Butt Lane	Land off Coppice Road, Talke (1)	Housing	47	N/A
TK25	22.79	Talke & Butt Lane	Land South of Audley Road and West of Pit Lane	Mixed use	729	18.23
TK27	2.82	Talke & Butt Lane	Land off Coppice Road, Talke (2)	Housing	90	N/A
TK30	66.37	Talke & Butt Lane	Land off Talke Road and A500, Talke	Mixed use	394	51.98
TK45	6.65	Talke & Butt Lane	Land North of Peacock Hay Road, Chatterley Valley	Employment	N/A	4.12
TK46	8.26	Talke & Butt Lane	Jamage North Reclamation Site, Talke	Housing	187	N/A
TK47	21.14	Talke & Butt Lane	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
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
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 (West), Holditch& Chesterton	Gypsy and Traveller	N/A	N/A
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

7.2 Overview of site assessments

- 7.2.1 **Appendix C** sets out the topic-specific methodology used to appraise the reasonable alternative sites in the SA process and how the likely impact per receptor has been identified, building on the SA methodology as set out in **Chapter 2**.
- 7.2.2 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation is presented in **Table 7.2**, indicating the overall impact symbol per SA Objective.
- 7.2.3 The assessment of the 141 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix D**.
- 7.2.4 **Appendix D** documents likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Table 7.2** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.
- 7.2.5 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.
- 7.2.6 The appraisal of the 141 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Table 7.2**.
- 7.2.7 A total of 141 reasonable alternative sites have been identified, described, and evaluated through the Plan-making process to date.
- 7.2.8 Newcastle-under-Lyme borough comprises of a mix of rural, urban, and sub-urban settings and therefore, the SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework.
- 7.2.9 Negative impacts were mainly related to issues associated with air quality due to the proximity of the new sites to the major roads; local wildlife and habitat sites; loss of previously undeveloped land, BMV soil, and coinciding with MSAs; coinciding with SWFR and landscape sensitivity zones, proximity to PRow network, and potential for coalescence/sprawl; and the access of site end users to healthcare facilities, schools, and transport services.
- 7.2.10 Positive impacts were identified in relation to the provision of new housing and employment floorspace, as well as potential for provision of LZC technologies, provision for waste management and recycling, benefits to health and accessibility as many sites are located within a sustainable distance to public greenspaces; and coinciding with Flood Zone 1 where fluvial flood risk is low.

- 7.2.11 Some of these negative impacts may be mitigated through policy and site design. At this stage of the plan-making process, NuLBC have prepared 23 draft policies (see **Chapter 6**). The potential mitigating influence of these draft Local Plan policies is considered within **section 7.3**. Further information regarding the post-mitigation performance of reasonable alternative sites should be assessed once the full suite of Local Plan policies has been prepared.

Table 7.2: Summary impact matrix table of all reasonable alternative sites

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Site Reference	Climate Change	Air	Biodiversity, Flora & Fauna	Natural Resources & Waste	Flooding	Water	Cultural Heritage	Landscape	Health & Wellbeing	Equality	Transport & Accessibility	Economy
AB2	+	-	-	--	--	-	0	--	-	0	-	++
AB4	+	-	-	-	+	-	0	--	-	++	-	+
AB12	-	0	-	-	-	+/-	0	--	-	++	-	0
AB15	+/-	0	+/-	-	-	+/-	0	--	-	+	-	0
AB16	-	0	-	--	--	+/-	-	--	--	++	-	0
AB22	+	0	-	-	--	+/-	0	--	-	++	-	0
AB27	+	0	-	-	+	+/-	0	-	-	+	-	0
AB30	+	0	-	-	-	+/-	0	--	-	++	-	+
AB32	+	0	-	-	-	+/-	-	--	-	+	-	0
AB33	-	0	+/-	-	--	+/-	-	--	-	+	-	0
AB34	-	0	-	-	+	-	0	--	-	++	-	0
AB37	-	0	--	-	--	-	-	--	-	++	-	0
AB72	+	0	-	-	+	+/-	0	--	-	+	-	0
AB73	+	0	-	-	+	+/-	0	--	-	+	-	0
AB75	+	0	-	-	--	+/-	0	--	-	++	-	+
AB77	+	0	-	--	-	-	-	--	-	++	-	++
AB78	+	-	+/-	-	-	-	-	--	-	+	-	0
AB79	+	0	-	-	--	-	-	--	-	+	-	0
HD26	+	0	-	-	-	+/-	0	--	-	+	-	-
HM8	+/-	-	-	-	-	+/-	0	--	-	++	-	0
HM10	+/-	0	-	-	-	+/-	0	--	-	+	-	0
HM15	+	0	--	-	+	+/-	0	-	-	+	-	0
HM22	+	0	-	-	+	+/-	0	-	-	+	-	0
HM66	+	0	-	-	--	+/-	0	--	-	+	-	0
CL6	+/-	0	+/-	-	-	+/-	0	+	-	+	-	0
CL8	+	-	-	-	-	+/-	-	--	-	+	-	0
SB12	+/-	-	-	++	+	+/-	-	-	-	+	-	0
CT1	+	-	-	-	-	+/-	0	-	-	++	-	0
CT10	+/-	0	--	-	-	+/-	0	-	--	++	-	+
CT20	+/-	0	--	-	-	+/-	0	-	-	0	-	+
CT25	+	0	-	-	+	+/-	-	--	-	++	-	0
CH3	-	0	+/-	++	-	+/-	0	-	--	++	-	0
CH13	+/-	0	+/-	-	--	+/-	0	+	--	--	-	0
CH14	-	0	+/-	+	-	+/-	0	+	-	-	-	-
KS3	-	0	-	-	--	+/-	0	-	-	++	-	0
KS11	+/-	0	+/-	-	+	+/-	0	+	-	-	-	-
KS17	-	0	+/-	-	-	+/-	0	-	-	+	-	-
KS18	+/-	0	+/-	-	+	+/-	0	+	-	+	-	0
KS19	+/-	0	-	-	+	+/-	0	+	-	-	-	0
KL9	+	-	-	-	-	+/-	-	--	-	++	-	0

Site 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
KL12	+/-	-	--	-	+	+/-	-	--	-	+	-	0
KL13	+	-	--	--	--	+/-	--	--	-	++	-	+/-
KL14	+	0	--	--	-	+/-	--	--	-	+	-	+/-
KL15	+	-	-	-	-	+/-	-	--	-	++	-	++
KL20	+	-	-	-	+	+/-	0	--	-	+	-	0
KL21	+	-	-	--	-	+/-	-	--	-	++	-	++
KL33	+	0	+/-	++	+	+/-	-	--	-	+	-	0
KL34	+	0	-	-	-	+/-	-	--	-	++	-	0
KG6	+/-	-	+/-	-	--	+/-	0	+	-	+	-	0
KG26	+/-	0	+/-	-	+	+/-	0	+	-	+	-	0
RC4	+/-	-	+/-	-	--	+/-	-	+	-	+	-	0
RC8	+/-	-	--	-	--	+/-	0	+	-	+	0	0
LW14	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW23	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW27	+/-	0	+/-	-	+	-	0	--	-	+	-	0
LW29	+/-	0	-	-	+	-	0	--	-	+	-	0
LW30	+/-	0	-	-	+	-	0	--	-	+	-	0
LW41	+/-	0	-	-	-	+/-	0	--	-	+	-	0
LW49	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW53	+/-	0	-	-	+	-	0	--	-	++	-	0
LW54	+/-	-	--	-	--	-	-	--	-	++	-	0
LW81	+/-	0	-	-	+	-	-	--	-	+	-	0
LW82	+/-	0	--	-	--	-	0	--	-	+	-	0
LW87	+/-	-	-	-	+	+/-	0	--	-	+	-	-
HM4	+/-	-	-	-	-	+/-	-	--	-	+	-	0
HM28	+/-	-	-	-	+	+/-	-	--	-	+	-	0
HM29	+/-	-	-	-	+	+/-	-	--	-	+	-	0
MD2	+	-	-	-	+	+/-	0	-	-	+	-	-
MD5	+/-	-	-	-	--	+/-	0	-	--	+	-	0
MD11	+	0	--	-	--	+/-	0	-	-	+	-	+/-
MD12	+	-	--	-	--	+/-	-	-	-	++	-	++
MD13	+	0	-	-	--	+/-	-	--	-	++	-	0
MD18	+	0	-	-	--	+/-	-	--	-	+	-	0
MD19	+	0	-	-	-	+/-	-	--	-	+	-	0
MD20	+	-	-	--	--	+/-	-	-	-	++	-	0
MD25	+/-	-	-	-	--	+/-	-	-	-	+	-	0
MD29	+/-	-	-	-	--	+/-	-	-	-	++	-	0
MD30	+/-	-	-	-	-	+/-	0	-	-	+	-	0
MD32	+/-	0	-	-	--	+/-	0	-	-	+	-	0
MD33	+/-	-	-	-	-	+/-	-	-	-	+	-	0
MD34	+	0	-	-	+	+/-	0	-	-	++	-	0

Site 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
MD39	+/-	-	-	-	+	+/-	-	-	-	+	-	0
MD40	+/-	0	-	-	+	-	0	-	-	+	-	0
MD56	+	-	--	-	-	+/-	-	-	-	++	-	0
LW6	+/-	-	--	-	-	-	0	--	-	+	-	+
LW7	+	-	-	-	+	+/-	-	--	-	++	-	0
LW9	+/-	-	+/-	-	+	-	-	--	-	+	-	0
LW38	+/-	-	-	-	+	-	-	--	-	+	-	0
LW42	+/-	0	-	-	+	+/-	0	--	-	+	-	0
LW48	+/-	-	--	-	+	-	0	--	-	+	-	0
LW74	+/-	-	-	-	+	-	-	--	-	++	-	-
LW78	+/-	-	-	-	+	-	-	--	-	+	-	0
LW83	+/-	0	+/-	-	-	+/-	0	-	-	+	-	0
LW84	+/-	-	+/-	-	+	-	-	--	-	+	-	0
LW86	+/-	-	-	-	+	-	-	--	-	+	-	+/-
NC13	+	0	-	-	--	+/-	0	-	-	++	-	0
NC77	+	-	-	-	--	+/-	-	-	-	+	-	+
NC78	+	-	-	-	--	+/-	-	--	-	+	-	0
NC80	+	0	-	-	-	+/-	-	--	-	++	-	0
NC81	+	0	-	-	-	+/-	0	--	-	++	-	0
NC83	+	0	-	-	--	+/-	0	-	-	+	-	0
SP2	+/-	0	-	-	+	+/-	0	-	-	+	-	-
SP11	+	-	--	-	-	+/-	-	--	-	++	-	-
SP12	+	0	-	-	+	+/-	0	--	-	+	-	0
SP14	+	-	--	-	-	+/-	-	--	-	++	-	0
SP22	+/-	0	+/-	-	--	+/-	-	+	-	+	-	0
SP23	+	-	-	-	+	+/-	-	--	-	++	-	0
BL3	+/-	-	--	-	--	+/-	--	-	-	++	-	0
BL8	+/-	0	-	-	--	+/-	0	-	-	+	-	+
BL18	-	-	--	-	--	+/-	0	-	-	++	0	0
BL24	+/-	-	+/-	-	--	+/-	0	+	-	+	-	0
BL32	+/-	-	-	-	--	+/-	0	-	-	+	-	+
TK6	-	0	+/-	-	--	+/-	0	-	-	+	-	0
TK10	+	0	-	-	+	+/-	-	--	-	++	-	0
TK17	+	-	-	-	-	+/-	-	-	-	+	-	0
TK18	+	-	--	-	--	-	0	--	-	++	-	++
TK24	+	0	-	-	--	+/-	-	-	-	+	-	0
TK25	+	0	--	-	-	+/-	-	--	-	++	-	++
TK27	+	0	-	-	-	+/-	-	-	-	+	-	0
TK30	+	-	--	-	--	+/-	-	-	-	++	-	++
TK45	+	-	--	-	-	+/-	0	--	--	0	-	+
TK46	+	-	--	-	--	-	0	--	-	++	-	0

Site 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
TK47	+	-	--	--	-	+/-	0	--	-	0	-	++
TB6	+/-	-	+/-	-	+	+/-	0	+	-	+	-	0
TB19	+	-	--	--	--	+/-	-	--	-	++	-	++
TB23	+/-	-	-	-	--	+/-	0	-	-	++	-	0
TB24	+/-	-	--	-	+	+/-	0	--	-	+	-	0
MB12	+/-	-	+/-	-	+	+/-	0	-	++	+	-	0
MB13	+/-	-	-	+	+	+/-	-	+	++	+	-	0
MB15	+/-	-	+/-	+	+	+/-	-	+	++	+	-	0
TC7	-	-	+/-	-	-	+/-	-	+	++	+	-	+
TC22	+/-	-	+/-	-	+	+/-	0	+	++	+	-	+
TC40	+/-	-	+/-	-	+	-	0	+	++	+	-	0
TC45	+/-	-	-	-	-	+/-	-	+	++	0	-	+/-
Site 1	+/-	-	--	-	+	-	0	--	-	+	-	0
Site 2	+/-	0	--	-	-	+/-	0	--	-	+	-	0
Site 3	+	0	-	-	--	+/-	0	--	-	+	-	0
Site 4	+/-	0	--	-	-	+/-	0	--	--	+	-	0
Site 5	+	-	-	-	+	+/-	-	--	--	+	-	0
Site 6	+/-	-	--	-	--	+/-	0	--	--	+	0	0
Site 7	+/-	-	-	-	+	+/-	0	--	-	+	-	0

7.3 Mitigation

7.3.1 The draft policies proposed in the Draft Local Plan have the potential to mitigate some of the adverse effects identified in the appraisal of reasonable alternatives. **Table 7.3** presents information about the potential adverse effects and how these might be mitigated by the draft policies.

Table 7.3 Likely adverse effects and policies for potential for mitigation

Identified likely adverse effects on 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.
- 14 sites in Newcastle & Mow Cop, Town Centre, Madeley & Betley and Kidsgrove clusters either coincide or are located within 200m of these designated AQMAs. The development proposals could exacerbate air pollution issues in existing AQMA.
- Several major roads pass through Newcastle- under-Lyme Borough including ring roads and intersections that lie within the boundary. As a result, 66 sites lie either adjacent or within 200m of these major roads.

Policies for mitigation of potential adverse effects associated with Air Quality

- Policy SE1; Pollution, Contamination and Amenity** states that 'development proposals that are likely to result in detrimental impacts on air quality and other forms of pollution will not be

permitted unless mitigation measures to reduce the impact of pollutants can be demonstrated'. The policy will ensure that the development will not result in any negative impact on AQMAs and will consider the cumulative effects of emissions from proposed developments.

- Policy **IN2: Transport and Accessibility** will tackle air pollution issues by focussing on reducing the need to travel and by encouraging sustainable transport options instead, which could likely result in improvement of air quality in Newcastle-under-Lyme.
- Policy **PSD7: Design** seeks improved provision and connectivity of green/blue infrastructure, which will contribute towards filtration of air pollutants and could potentially result in improvement of air quality.

Identified likely adverse effects on Biodiversity, Flora and Fauna

- The proposed development allocations are likely to cause threats and pressure on designated biodiversity sites such as SSSIs, LWSs (both SBI and BAS), LNRs and RIGS within Newcastle-under-Lyme borough.
- Several development allocations lie either wholly or partially within IRZ which residential development could negatively impact the nearby SSSIs.
- Some 58 development allocations are either adjacent or in proximity to ancient woodland and 29 development allocations coincide with priority habitats, leading to fragmentation and isolation of the wider ecological network.
- Several development allocations could potentially threaten the habitat distinctiveness within the borough as 78 development allocations coincide with locations that have been classified using the 'medium', 'high' and 'very high' distinctiveness BNG categories.

Policies for mitigation of potential adverse effects associated with Flora and Fauna

- Policy **SE5: Biodiversity, Flora and Fauna** 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 for. It is expected that this policy will help to deliver an overall measurable net gain in biodiversity.
- Policies **PSD7: Design** and **CRE1: Climate Change** seek improved provision and connectivity of green/blue infrastructure, to retain and improve habitat connectivity and ecological corridors amongst built development.
- Under policy **IN1: Infrastructure**, development proposals are expected to provide biodiversity net gain along with provision of a range of infrastructure and utilities.
- Policy **SE1: Pollution, Contamination and Amenity** seeks to reduce air pollution and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition.
- Policy **SE2: Flood Risk, Water Resources and Management** will benefit biodiversity by promoting Sustainable Drainage System (SuDS) that can be integrated into the blue and green infrastructure network.
- The protection or improvement of water quality as promoted by policy **SE3: Water resources and Water Quality** will be likely to have a positive impact on the local ecological network.
- Policy **SE7: Landscape** encourages the use of native species in landscaping schemes, and integration of developments with existing green and blue infrastructure networks.

Identified likely adverse effects on Natural Resources and Waste

- The majority of the proposed allocations comprises of greenfield land, either wholly or partially.
- Boundaries of 65 sites coincide with moderate to very good quality agricultural land (ALC Grade 2 and 3). Development at these locations could potentially have an adverse impact on the soil resources and lead to a loss of BMV agricultural land.
- Some 122 of the reasonable alternative sites coincide with the MSAs and therefore have the potential for sterilisation of the mineral resources, meaning that mineral resources will be inaccessible for potential extraction in the future.

Policies for mitigation of potential adverse effects associated with Natural Resources and Waste

- Policy **PSD4: Development Boundaries and the Open Countryside** encourages the redevelopment and re-use of previously developed land and seeks to restrict new development within the open countryside to specific circumstances. This will help to protect existing soils and vegetation within the open countryside areas and help promote an efficient use of land in these areas and minimise the loss of undeveloped land for new built form.
- Policies **PSD7: Design** and policy **SE5: Biodiversity and Geodiversity** seek improved provision and connectivity of green/blue infrastructure, that will protect 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.
- Policy **CRE2: Renewable Energy** promotes sustainable construction methods which utilise locally sourced and recycled materials, which could potentially result the conservation of natural resources and minimisation of waste.
- Policy **SE1: Pollution, Contamination and Amenity** 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, could potentially help prevent the loss of ecologically or agriculturally valuable soil resources.

Identified likely adverse effects on Flooding

- The occurrence of extreme weather events is likely to increase in the near future due to the changing climate. In the UK, the rising risk of fluvial and surface water flooding is of primary concern.
- Several sites in Newcastle-under-Lyme borough coincide with areas prone to the risk of fluvial and 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 **SE2: Flood Risk, Water Resources and Management** 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 SFRA. The policy promotes the use of SuDS to manage surface water run-off and to reduce the risk of surface water flooding and encourages opportunities to be sought for integrating multi-functionality.
- Policies **PSD7: Design**, **CRE1: Climate Change**, **SE5: Biodiversity and Geodiversity** and **SE7: Landscape** seek 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.
- Policy **INI: Infrastructure** seeks 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. This will contribute towards flood management in Newcastle-under-Lyme borough.

Identified likely adverse effects on Cultural Heritage

- Development which coincides with or is located in close proximity to Listed Buildings, RPGs, SMs or Conservation Areas, has the potential to affect both the asset itself and its setting.
- Several reasonable alternative sites and their proposed development could potentially have an adverse impact on the setting of these cultural heritage assets and could alter their historic character and setting.

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 **SE6: Historic Environment** sets out the requirement for development proposals to “avoid harm to designated and non-designated assets, including their setting in a manner suitable to their significance” and will ensure Heritage Assessments are carried out where there is potential for adverse effects to occur. The policy further states that proposals should respect and enhance significant views and the setting of cultural heritage assets.
- Policy **SE7: 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 and the overall landscape character of the area.

Identified likely adverse effects on Landscape

- Some 71 proposed allocations could potentially lead to the adverse impacts on landscape quality.
- Some 53 sites are located in ‘medium’ landscape sensitive areas and 56 sites located in ‘high’ landscape sensitive areas as per the Landscape and Settlement Character Assessment 2022.
- In terms of impacts on the Green Belt, 28 sites are located in ‘moderate’ and 27 sites are located in ‘strong’ areas of contribution to the Green Belt upon site release.
- Some 86 development allocations could increase the risk of urbanisation/sprawl of development into the countryside.

Policies for mitigation of potential adverse effects associated with Landscape

- Policy **SE7: Landscape** will ensure that development proposals are guided by the findings of the Landscape and Settlement Character Assessment (LSCA) and the Landscape Strategy, thereby conserving and enhancing the local landscape character and distinctiveness.
- 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 **RE1: 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.
- Under policy **PSD4: Development Boundaries and the Open Countryside** development proposals will be supported where they keep in with the surrounding landscape, role and scale of the settlement and therefore can protect and enhance landscape character.
- Policy **PSD5: Green Belt and Safeguarded Land** will protect the retained Green Belt and helps to prevent urban sprawl, which in turn can help to protect landscape character.

Identified likely adverse effects on Health and Wellbeing

- Several development allocations have poor access to health care with 104 sites located beyond 5km of a hospital and 80 sites located beyond 800m from a GP surgery.
- Some 134 development allocations are located beyond 1.2km of leisure facilities, reflecting poor access to leisure facilities.

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, addressing health inequalities and providing good access to services.
- Policy **SE4: Open Space, Sports and Leisure Provision** will help to ensure that local residents have access to open spaces, sports and leisure and that provision of such services meets the local demand and is under protection to enhance and maintain open spaces and facilities.
- 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 health care facilities) through a range of criteria for new development proposals.

- 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 mentions provision of high-quality neighbourhoods which are well connected via active travel routes and integrated open spaces and green/blue infrastructure.
- Policy **PSD2: Settlement Hierarchy** sets out the hierarchy of settlements within the borough and how development should be directed, providing new residents with strong healthcare facilities and leisure facilities with development being centred towards locations that have a higher capacity of services/facilities.

Identified likely adverse effects on Transport & Accessibility

- Some 132 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.
- Site access to local cycle networks and pedestrian access to the sites are poor, whereby 126 sites were assessed as having no access to the surrounding cycle network and 55 sites have poor access to the existing footpath network.
- Access to local schools from assessed sites was overall poor, specifically access to secondary schools whereby 79 sites assessed are located at a distance greater than 1.2km from the nearest secondary school.

Policies for mitigation of potential adverse effects associated with Transport & Accessibility

- Policy **IN2: Transport and Accessibility** seeks to promote sustainable transport and promote improved connectivity to local services, such as 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.
- Under **PSD7: Design** development is guided to improve accessibility and connectivity to align with the Building for a Healthy Life (BHL) design toolkit, that mentions walking, cycling and public transport.
- Policy **PSD2: Settlement Hierarchy** sets out the hierarchy of settlements within the borough and can help to direct development in relation to infrastructure service provision, namely by prioritising development in and around the town centre. Consequently, development located in these areas can be expected to deliver higher levels of sustainability as residents can utilise sustainable transport and optimise active travel.
- 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.

7.4 Selection and rejection of sites

- 7.4.1 The SA has assessed reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is NuLBC'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.
- 7.4.2 The SA findings (as set out in **Appendix D**) were fed back to the Council as part of the iterative SA and Local Plan process, to assist in decision-making regarding the selection or rejection of each site within the emerging Local Plan.
- 7.4.3 Planning Practice Guidance (PPG) on SEA states that the SA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward.

7.4.4 At this stage of the plan-making process (Regulation 18), NuLBC have selected 42 sites as preferred allocations and rejected 95 sites from consideration, with four sites marked “N/A” as these are strategic sites that the Council has not expressed a view on, seeking comments through the Local Plan consultation to inform Regulation 19 version of the plan. The outline reasons for selection and rejection of each reasonable alternative site are set out in **Table 7.3**, provided by NuLBC.

Table 7.4: Outline reasons for selection / rejection of reasonable alternative sites for the Newcastle-under-Lyme Local Plan

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
AB2	Audley	Land adjoining corner of A500 and M6 southbound	Employment	N/A	The site is a strategic location in the Plan. The Council has not expressed a view on the site and is seeking comments through the Local Plan consultation to inform the Regulation 19 version of the Plan.
AB4	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
AB12	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 rough 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	Audley	Land North of Vernon Avenue, Audley	Housing		The site is a preferred site in the Local Plan as it has the potential to contribute towards the development

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Selected	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	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	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.
AB27	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 Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					site. The site has poor access to services and facilities, mature trees on site
AB30	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
AB32	Audley	Land Nursery Gardens, 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. The site should be considered alongside AB33.
AB33	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. The site should be considered alongside AB32.
AB34	Audley	Land off Nantwich Road / Park Lane (2) Audley	Housing		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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Rejected	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	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	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 and would result in the loss of agricultural land. There are also concerns over access to the site, particularly as there are no public footpaths on the site side.
AB73	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					sustainable transport) into the site.
AB75	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	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	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	Audley	Land South of Cross Lane, Audley	Housing		The site makes a moderate contribution to Green Belt purposes. The site is

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Rejected	isolated and disconnected from Audley and Bignall End and there are concerns regarding access into the site. Poor access to services and facilities
HD26	Audley	Land South of Shralebrook 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.
HM8	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	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.
HM15	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					in the Scot Hay settlement. The site has poor access to services and facilities.
HM22	Audley	Land adj Holly House, Crackley Lane, Scot Hay	Housing	Rejected	The site is currently non preferred. 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
HM66	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.
CL6	Clayton, Westbury Park & Northwood	Stafford Crescent (garage site)	Housing	Rejected	The site is not currently preferred as it is irregular in shape and access to the site is constrained
CL8	Clayton, Westbury Park & Northwood	Land East of Cambridge Drive (2), Clayton	Housing	Rejected	The site is currently non preferred as access into the site is constrained
SB12	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 subject to defensible boundaries being created with the Green Belt.

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
CT1	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	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.
CT20	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	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
CH3	Cross Heath & Knutton	Land at Hoon Avenue, Newcastle	Housing	Rejected	The site is currently non preferred as it is a greenfield site. It would result in the loss of open space identified in the Open Space Strategy. It may also have impacts on local ecology and landscape.
CH13	Cross Heath & Knutton	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.

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
CH14	Cross Heath & Knutton	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	Cross Heath & Knutton	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	Cross Heath & Knutton	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	Cross Heath & Knutton	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	Cross Heath & Knutton	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	Cross Heath & Knutton	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.
KL9	Keele	Land west of Quarry Bank Road, Keele	Housing	Rejected	The site is not currently preferred as it is a greenfield site. The site makes a moderate contribution to Green Belt purposes. There are also concerns over surface water flooding impacts, issues with topography and landscape impacts.

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
KL12	Keele	Land north of Keele University, Keele	Housing	Rejected	This site is not currently preferred as it is heavily wooded
KL13	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	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	Keele	Land South of A525 between Keele University and Newcastle	Mixed use	N/A	The site is a strategic location in the Plan. The Council has not expressed a view on the site and is seeking comments through the Local Plan consultation to inform the Regulation 19 version of the Plan.
KL20	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	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)
KL33	Keele	Land West of Keele Road, Keele Road	Housing		The site is not currently a preferred site. The site makes a moderate contribution

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Rejected	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	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)
KG6	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	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	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	Kidsgrove & Ravenscliffe	Land at Liverpool Road (part of Birchenwood) Kidsgrove (parcel 2)	Housing		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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Selected	the urban area and has previously received planning approval (now lapsed) for residential development so that the principle of residential development has been accepted on the site previously.
LW14	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	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	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	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	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	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	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	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					requirements of the borough.
LW54	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	Loggerheads	Gravel Bank, Muckleston Road, Loggerheads	Housing	Rejected	This site is not currently preferred as it is harmful to local character/appearance of area
LW82	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	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.
HM4	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
HM28	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	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					access to a range of services and facilities
MD2	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	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).
MD11	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	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					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	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	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.
MD19	Madeley & Betley	Land East of Furnace Lane, Madeley	Housing		The site is not currently a preferred site. The site makes a

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Rejected	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	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	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	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					reduced to around 150 dwellings.
MD30	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	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	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	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.
MD39	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	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.

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
MD56	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	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	Maer & Whitmore	Land off Whitmore Road	Housing	Rejected	This site is not currently preferred as access to site is constrained
LW9	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.
LW38	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	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
LW48	Maer & Whitmore	Land at Chorlon Moss, Baldwin's Gate	Housing	Rejected	This site is not currently preferred as it is heavily wooded. Access to site is also constrained
LW74	Maer & Whitmore	Land at Baldwin's Gate Farm, Site B	Housing	Rejected	The site is not currently preferred due to access to services and facilities, loss of agricultural land and harm to the character and appearance of the countryside.
LW78	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	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	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	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
NC13	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.
NC77	Newchapel & Mow Cop	Bent Farm, Newchapel	Mixed use	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					Belt and appropriate fowl and surface water drainage and water management evidence
NC78	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	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	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	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	Silverdale	Cheddar Drive, Silverdale	Housing		The site is currently a preferred site as it will make a contribution to the development

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Selected	requirements of the borough. The site has previously had planning approval for residential development accepting the principle of residential development on the site.
SP11	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	Silverdale	Site off Glenwood Close, Silverdale	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 should be considered alongside SP11
SP14	Silverdale	Site at Gallowtree Roundabout, Silverdale	Housing	Rejected	The site is not currently a preferred site. Steep topography prohibits development
SP22	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.
SP23	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					with the Green Belt and be considered alongside SP11 and SP12
BL3	Talke & Butt Lane	Land at Slacken Lane, Talke (1)	Housing	Rejected	The site is currently not currently preferred as it is a greenfield site. There are also 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	Talke & Butt Lane	Land adjacent to roundabout at West Avenue, Kidsgrove	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	Talke & Butt Lane	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 fowl and surface water drainage and water management evidence.
BL24	Talke & Butt Lane	Land adjacent 31 Banbury Street, Talke	Housing	Selected	The site is a preferred site in the Local Plan as it is a brownfield and vacant site which has previously had planning permission for residential

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					development. The site is considered, in principle, suitable for residential development
BL32	Talke & Butt Lane	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	Talke & Butt Lane	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	Talke & Butt Lane	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	Talke & Butt Lane	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 Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					site and the Green Belt
TK18	Talke & Butt Lane	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	Talke & Butt Lane	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.
TK25	Talke & Butt Lane	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
TK27	Talke & Butt Lane	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
TK30	Talke & Butt Lane	Land off Talke Road and A500, Talke	Mixed use	N/A	The site is a strategic location in the Plan. The Council has not expressed a view on the site and is seeking comments through the Local Plan consultation to inform the Regulation 19 version of the Plan.
TK45	Talke & Butt Lane	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	Talke & Butt Lane	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	Talke & Butt Lane	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					ancient woodland and a site of biological importance. The site has poor access to a range of services and facilities.
TB6	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	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
TB23	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	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	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	Town Centre and May Bank	Hyacinth Court, May Bank	Housing		The site is currently a non-preferred site in the Plan. It is currently a garage site and

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
				Rejected	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	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	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
TC22	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
TC40	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
TC45	Town Centre and May Bank	York Place, Newcastle Town Centre	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 is potential site specific issues including the presence of overhead power lines etc.
Site 1	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	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	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	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	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	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 7	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

Site Reference	Cluster (ward)	Address	Proposed site use	Selected / rejected?	Outline reason
					suitable for allocation at this time.

8 Next Steps

8.1 Consultation on the Regulation 18 Issues and Preferred Options SA Report

8.1.1 This Regulation 18 SA Report is subject to an 8-week consultation between 19th June and 14th August 2023 alongside the Draft Plan and HRA.

8.1.2 This report represents the latest stage of the SA process. The SA process will take on board any comments received regarding this report and use them to furnish the next report with greater detail and accuracy.

8.2 Responding to the consultation

8.2.1 This Regulation 18 SA Report will be published by NuLBC for consultation. Consultation findings will be used to inform subsequent stages of the SA process.

8.2.2 All responses on this consultation exercise should be sent to:

Newcastle-under-Lyme Planning Policy

Newcastle-under-Lyme Borough Council
Floor 2, Castle House
Barracks Road
Newcastle-under-Lyme
Staffordshire
ST5 1BL

Email: planningpolicy@newcastle-staffs.gov.uk

Habitats 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



© Lepus Consulting Ltd

Eagle Tower

Montpellier Drive

Cheltenham

GL50 1TA

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELTENHAM



Lepus Consulting
Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan

Including: Strategic Environmental Assessment and
Equality Impact Assessment

Volume 3 of 3 : Appendices

May 2023



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Newcastle-under-Lyme Local Plan

Including:
Strategic Environmental Assessment
and Equality Impact Assessment

Volume 3 of 3: Appendices

LC-936	Document Control Box
Client	Newcastle-under-Lyme Borough Council
Report Title	Sustainability Appraisal of the Newcastle-under-Lyme Local Plan Volume 3 of 3: Appendices
Status	Final
Filename	LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB.docx
Date	May 2023
Author	LB & SS
Reviewed	GW & AH
Approved	ND

Front Cover: Newcastle-under-Lyme Market, Staffordshire

Appendices

[Appendix A – SA Framework](#)

[Appendix B – Plan, Policy and Programmes Review](#)

[Appendix C – Site Assessment Methodology and Assumptions](#)

[Appendix D – Reasonable Alternative Site Assessments](#)

[Appendix E – Draft Policy Assessments](#)

[Appendix F – Equality Impact Assessment](#)

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"> Will it help reduce the per capita carbon footprint of Newcastle-under-Lyme? Will it help to facilitate and encourage the use and generation of renewable energy? Will it promote use of technologies and techniques to adapt to the impacts of climate change? Will it 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"> Will it reduce air pollution and help to improve air quality? Will it reduce pollution from traffic? Will it 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"> Will it maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity designations? Will it ensure that there is an overall net gain in the extent and quality of biodiversity? Will it link up areas of fragmented habitat contribute to habitat connectivity? Will it increase awareness of biodiversity assets? Will it protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver biodiversity benefits? Will it optimise benefits from nature? Will it protect and enhance ecosystem services? Will it protect, enhance or restore the ecological network? Will it 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"> Will it utilise previously developed, degraded and under-used land? Will it lead to the loss of the best and most versatile agricultural land? Will it maintain soil quality or help to remediate land affected by ground contamination? Will it lead to the loss or sterilisation of mineral resources, or affect mineral working? Will it encourage recycling/re-use/composting of waste? Will it 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"> Will it avoid development in areas at high risk of flooding? Will it reduce the risk of fluvial, surface water, groundwater and sewer flooding to existing and new developments? Will it protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver climate change adaptation and flood-relief benefits? Will it promote the use of SuDS? Will it 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"> Will it maintain and improve water quality to WFD standards? Will it ensure efficient use of water and encourage water to be stored for re-use? Will it reduce the demand for water and maintain a sufficient water supply? Will it reduce pollution of groundwater, watercourses and rivers from run-off, including nitrates/phosphates? Will it provide adequate utilities infrastructure to service development to avoid impacts on the environment? Will it safeguard water resources to maintain an adequate level of river and ground water? Will it deliver no net loss of the water supply? Will it 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

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
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"> Will it conserve and enhance features of architectural or historic interest and, where necessary, encourage their conservation and renewal? Will it conserve and enhance archaeological sites/remains? Will it conserve and enhance the setting of cultural heritage assets? Will it improve the energy efficiency of historic buildings? Will it improve access to the borough's cultural and historical assets? Will it promote the sensitive re-use of important buildings? Will it 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.
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"> Will it ensure new development is in keeping with the surrounding character and distinctiveness? Will it safeguard and enhance local distinctiveness and identity? Will it protect and enhance visual amenity, including light and noise pollution? Will it improve the appearance of degraded landscapes/ townscapes? Will it lead to coalescence of settlements and/or urban sprawl? Will it prevent urban sprawl by keeping land permanently open? Will it 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"> Will it help to improve the overall health and mental wellbeing of the community? Will it encourage healthy lifestyles? Will it improve sustainable access for all to health, leisure and recreational facilities? Will it encourage access to green space? Will it protect, enhance or restore the quantity and connectivity of green and blue infrastructure assets that deliver health benefits? Will it 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.

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
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"> • Will it help achieve life-long learning and increase learning participation and adult education? • Will it enable communities to influence the decisions that affect their neighbourhoods and quality of life and foster good community relations? • Will it eliminate unlawful discrimination, victimisation and harassment? • Will it reduce crime and the fear of crime? • Will it ensure sustainable accessibility to community facilities? • Will it 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? • Will it 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.
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"> • Will it reduce the need to travel and/or reduce travel time? • Will it reduce the need to travel by private vehicle? • Will it reduce existing congestion and mitigate future increases? • Will it improve the choice of transport available? • Will it provide adequate means of access by a range of sustainable transport modes to promote active travel (i.e., walking/cycling/public transport)? • Will it provide safe walking and cycling routes? • Will it 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.

Appendix B: PPP Review

B.1	International plans and programmes	B1
B.2	National plans and programmes.....	B3
B.3	Sub-Regional plans and programmes	B7
B.4	Local Environmental plans and programmes	B9
B.5	Local Social Plans and Programmes.....	B12
B.6	Local Economic Plans and Programmes	B13
B.7	Local Existing Planning Policy.....	B14

Table B.1.1:	International Plans and Programmes	B1
Table B.2.1:	National Plans and Programmes.....	B3
Table B.3.1:	Sub-regional Plans and Programmes	B7
Table B.4.1:	Local Environmental Plans and Programmes.....	B9
Table B.5.1:	Local Social Plans and Programmes.....	B12
Table B.6.1:	Local Economic Plans and Programmes.....	B13
Table B.7.1:	Local Existing Planning Policy.....	B14

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)	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)	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	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)	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)	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
Bern Convention on Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EC, Habitats Directive) (1992)	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)	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)	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)	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

Title of plan or Programme	Main objectives of relevant plans, policies and programmes	Sustainability Theme
EU Sustainable Development Strategy (2006)	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 able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion.	Encourage sustainable waste management
European Commission Biodiversity Strategy (2012)	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)	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)	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)	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)	Designed to prevent and combat groundwater pollution in the European Union.	Improve water quality
Habitat and Species Directive 92/43/EEC (1992)	Ensures the conservation of a wide range of rare, threatened or endemic animal and plant species.	Improve biodiversity
Kyoto Protocol (1997)	Commits industrialized countries and economies in transition to limit and reduce greenhouse gases (GHG) emissions in accordance with agreed individual targets.	Climate change mitigation
Nitrates Directive (91/676/EEC)	Aims to protect water quality across Europe by preventing nitrates from agricultural sources polluting ground and sur- face waters and by promoting the use of good farming practices.	Improve water quality
Water Framework Directive (2000/60/EC)	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)	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)	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

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)	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
Good Practice Advice Notes	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	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)	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)	The Act requires the Government to set legally binding emissions targets, called carbon budgets, every five years. It also established an independent expert body, the Committee on Climate Change (the CCC), to advise Government on the level of those emissions targets.	Climate change mitigation
Conservation of Habitats and Species Regulations (2017)	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
DCLG (2013) CIL Guidance	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
DCLG (2012) Neighbourhood Planning	The guidance explains the neighbourhood planning system introduced by the Localism Act, including key stages and considerations required.	Ensures sustainable community development
DECC (2011) National Energy Statement (EN1)	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

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability Theme
Defra (2013) Adapting to Climate Change: Ensuring Progress in Key Sectors	Ensure climate change risk management is systematically undertaken by reporting authorities and helps ensure public service and infrastructure are resilient to climate change. Monitors the level of preparedness of key sectors to climate change.	Climate change mitigation
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland	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
Defra (2011) Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services	A biodiversity strategy for England built on the Natural Environment White Paper and provided a comprehensive picture of how we are implementing our international and EU commitments. It set out the strategic direction for biodiversity policy for the next decade.	Improve biodiversity
Defra (2013) Government Forestry Policy Statement	Sets out clear priorities for future policy-making, focused on protecting, improving and expanding our public and private woodlands.	Improve biodiversity
Defra (2005) Making Space for Water: Taking forward a new Government strategy for flood and coastal erosion risk management in England	Takes account of sustainable development and the Government's strategic priorities. Reflects 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 risk and coast.	Flood risk management
Defra (2012) Noise Policy Statement for England	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 Strategy	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 Soils	Aims to ensure all England's soils will be managed sustainably and degradation threats tackled successfully by 2030.	Improve geodiversity
Defra (2015) sustainable Drainage Systems – Non- statutory Technical Standards for sustainable Drainage Systems	Non-statutory technical standards for the design, maintenance and operation of sustainable drainage systems to drain surface water.	Flood risk management
Environment Act (2005, 2021)	Contains a range of measures to improve the quality of the local environment by giving local authorities and the Environment Agency additional powers to deal with.	Sustainability choices made locally
Environment improvement plan (2023)	Contains actions to restore nature, tackle environmental pollution and increase the prosperity of the country,	Sustainability choices made locally

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability Theme
		Improve biodiversity
Flood and Water Management Act (2010)	Provides for 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 to the consumer.	Flood risk management
Flood Risk Regulations (2009)	Provides the Environment Agency and local authority's guidance on their responsibilities when preparing flood risk management plans.	Flood risk management
Government and Forestry Policy Statement (2013)	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)	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/Defra (2012) UK Post 2010 Biodiversity Framework	Identifies the activities required to complement the country biodiversity strategies, and where work in the country strategies contributes to international obligations. In total, 23 areas of work were identified where all four countries agreed that they wanted to contribute to, and benefit from, a continued UK focus.	Improve biodiversity
Localism Act (2011)	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)	Provides evidence about the relationships between health and spatial design, and the socio- economic gradient in environmental disadvantage.	Improve access to healthcare
The 2020 Flood and Coastal Erosion Risk Management Strategy	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
National Policy Statements for Energy	Sets out the Government's policy for delivery of major energy infrastructure.	Climate change mitigation
National Policy Statements for Transport	Sets out the Government's policy for delivery of major transport infrastructure.	Improve sustainable transport
National Policy Statements for Water, Waste Water and Waste	Sets out the Government's policy for delivery of major waste water infrastructure.	Improve water quality
Natural Environment and Rural Communities Act (2006)	Created Natural England and the Commission for Rural Communities and extended the biodiversity duty set out in the Countryside and Rights of Way Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.	Improve biodiversity
Natural Environment White Paper (2011)	Recognises that the healthy natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing.	Improve green infrastructure

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability Theme
Planning Listed Building Conservation Area Act (1990)	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)	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
Urban Waste Treatment Directive (1991)	Concerns collection, treatment and discharge of urban waste water and the treatment and discharge of waste water from certain industrial sectors.	Improve water quality
The Water Act (2014)	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
Wildlife and Countryside Act 1981 (as amended)	The primary legislation which protects animals, plants and habitats in the UK.	Improve biodiversity
National Design Guide (2019, DLUHC)	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 (2021, Birkbeck & Kruczkowski with Jones, McGlynn and Singleton)	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
Level 1 Strategic Flood Risk Assessment Report (October 2019)	Assessment to inform decisions on the location of future development and the preparation of sustainable policies for the long-term management of flood risk.	Flood risk management

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
Staffordshire Local Nature Partnership (LNP)	Has the vision to make Staffordshire a more prosperous and healthy environment to live in and 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
Landscape Character Areas (LCAs) – Shropshire Cheshire and Staffordshire Plain (NCA 61) and The Potteries and Churnet Valley (NCA 64)	LCA documents identify and explain the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas. LCAs are used to inform planning policies, the allocation of land for development, the assessment of planning applications and the process of Environmental Assessment.	Strengthen the quality of landscapes
Meres and Mosses Nature Improvement Area (Defra)	Focussed on making better places for nature, people and communities by improving and protecting core sites, and connecting them by restoring the wetland habitats in and around them.	Improve green infrastructure
River Basin Management Plans (RBMP) – Humber RBMP, North Western District RBMP and Severn RBMP	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)	A licensing strategy to manage water resources in the Staffordshire Trent Valley Area.	Improve water quality
Flood Risk Management Plans (FRMP) – Humber, North West and Severn Basin Districts	FRMPs set out how organisations, stakeholders and communities will work together to manage flood risk.	Flood risk management
Severn Trent's Water Resource Management Plan (2019)	Sets out how water will be supplied to all customers for the next 25 years and beyond.	Improve water quality
Stoke-on-Trent and Staffordshire Local Enterprise Partnership	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 – Strategy'	The LEP brings businesses and local authorities together to drive economic growth, create jobs and raise skill levels.	Improve employment opportunities

Title of plan or programme	Main objectives of relevant plans, policies and programmes	Sustainability Theme
Staffordshire Chambers Business Manifesto 2015	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 Two	Focuses on town and city centre development, with major improvements to Stoke-on-Trent city centre access, alongside programmes to enhance the appeal of our attractive 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)	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

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 Historic Environment Record	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 Structures	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	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
Staffordshire Biodiversity Action Plan (SBAP) (1998)	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)	Produced to influence policy by liaising with local planning authorities and ensuring that geodiversity issues are incorporated into local planning documents.	Improve geodiversity
Newcastle-under-Lyme Open Space and Green Infrastructure Strategies	A guide to how the Borough Council managed its open space to ensure that the needs of the community are being met in the most appropriate way. The strategy also addresses how land outside of the council's ownership is provided and maintained.	Improve green infrastructure
The Minerals Local Plan for Staffordshire 2015-2030	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 and should be based on core planning principles including conservation and enhancement of the natural environment and reducing pollution as well as conserving heritage assets.	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 strategy	Local Authorities across Staffordshire and Stoke on Trent have collaborated to produce a refreshed Joint Waste Management Strategy, setting out the direction for Waste Management in Staffordshire up to 2020 and retained the Zero Waste objective. The refreshed document was written in 2013 to create additional outcomes for the remaining years of the Waste Management Strategy.	Encourage sustainable waste management

Title of plan or Programme	Main objectives of relevant plans policies and programmes	Sustainability Theme
Staffordshire Warmer Homes	A scheme run by Staffordshire County Council, in partnership with district and borough councils. The goal is to combat fuel poverty across the county and help residents to heat their homes.	Meeting housing needs
Staffordshire Local Flood Risk Management Strategy 2015	Sets out roles and responsibilities for flood risk management, assessed the risk of flooding in the county, where funding can be found to manage flood risk, what our policies are as a Lead Local Flood Authority and what our objectives and actions are to manage flood risk.	Flood risk management
Newcastle-under-Lyme Contaminated Land Strategy (2014)	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 Plan	This ROWIP establishes a framework for managing the rights of way network over the next 10 years and sets out our priorities for improving it 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 2019-2024	This document details how the council is going to be improving air quality both in the 4 Air Quality action Areas and across the borough as a whole.	Improve air quality
Staffordshire County Council climate change adaptation & mitigation report 2020	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) / Green Belt Village Study (2019)	These assessments form an objective evidence base indicating how the green belt contributes towards the 5 purposes of green belt in the NPPF.	Strengthen the quality of landscapes
Newcastle-under-Lyme Landscape & Settlement Character assessment study and landscape strategy 2022	LCA documents identify and explain the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas. LCAs are used to inform planning policies, the allocation of land for development, the assessment of planning applications and the process of Environmental Assessment.	Strengthen the quality of landscapes
Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study 2020	The study considers the impact of potential growth on waste water treatment works for the region and makes recommendations regarding water resources, supply and conservation.	Improve water quality
Newcastle-under-Lyme Biodiversity opportunity mapping 2014	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

Title of plan or Programme	Main objectives of relevant plans policies and programmes	Sustainability Theme
Newcastle Borough Council Nature Recovery Network Mapping (2023)	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

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 2015-2020	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 2015-2020	Provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2015 and 2020.	Improve access to leisure facilities
Newcastle-under-Lyme Sustainable Community Strategy 2008-2020	Aims to shape a local identity with strong, safe and attractive communities and creating a thriving economy offering opportunity for all.	Protect and enhance the vitality and viability of city, town and district centres
Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015)	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.	Meeting housing needs
Newcastle-under-Lyme Housing Strategy 2016-2021	Supports the delivery of affordable housing and development and 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	This strategy sets out the council's priorities for the development of its homelessness strategy for the period 2020 to 2025.	Reduce homelessness
A Whole Life Disability Strategy for Staffordshire 2018-2023	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 2015-2020	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
Borough Integrated Transport Strategy for Newcastle-under-Lyme (2015)	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

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	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	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)	The plan covers walking, cycling, public transport, car based travel and freight, together with the management and maintenance of local road and footways.	Improve sustainable transport
Stoke-on-Trent Transport Plan 3	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
Newcastle-under-Lyme and Stoke-on-Trent retail and leisure study 2019	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

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)	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
Newcastle-under-Lyme Local Plan (2011) Saved Policies	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 Supplementary Planning Documents (SPDs): <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 	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

Appendix C: Site Assessment Methodology and Assumptions

Appendix C Contents

C.1	Introduction.....	C1
C.2	SA Objective 1: Climate Change	C2
C.3	SA Objective 2: Air	C4
C.4	SA Objective 3: Biodiversity, Flora and Fauna	C6
C.5	SA Objective 4: Natural Resources and Waste.....	C12
C.6	SA Objective 5: Flooding	C17
C.7	SA Objective 6: Water	C19
C.8	SA Objective 7: Cultural Heritage	C22
C.9	SA Objective 8: Landscape	C25
C.10	SA Objective 9: Health and Wellbeing	C29
C.11	SA Objective 10: Equality	C33
C.12	SA Objective 11: Transport and Accessibility	C36
C.13	SA Objective 12: Economy	C41

Tables

Box C.2.1:	SA Objective 1: Climate Change strategic assessment methodology	C3
Box C.3.1:	SA Objective 2: Air strategic assessment methodology.....	C5
Box C.4.1:	SA Objective 3: Biodiversity, Flora and Fauna strategic assessment methodology.....	C9
Box C.5.1:	SA Objective 4: Natural resources strategic assessment methodology	C15
Box C.6.1:	SA Objective 5: Flooding strategic assessment methodology	C18
Box C.7.1:	SA Objective 6: Water strategic assessment methodology.....	C21
Box C.8.1:	SA Objective 7: Cultural Heritage strategic assessment methodology	C23
Box C.9.1:	SA Objective 8: Landscape and Townscape strategic assessment methodology.....	C27
Box C.10.1:	SA Objective 9: Health and Wellbeing strategic assessment methodology.....	C32
Box C.11.1:	SA Objective 10: Equality strategic assessment methodology	C35
Box C.12.1:	SA Objective 11: Transport and Accessibility strategic assessment methodology	C40
Box C.13.1:	SA Objective 12: Economy strategic assessment methodology	C41

C.1 Introduction

C.1.1 Overview

- C.1.1.1 This appendix provides additional context to **Chapter 2** of the main Regulation 18 SA Report regarding the methodology used to assess policies and reasonable alternatives within the emerging Newcastle-under-Lyme Local Plan.
- C.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.
- C.1.1.3 The topic-specific methodologies set out in **Boxes C.2.1** to **C.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 2.4**.
- C.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.
- C.1.1.5 **Appendix D** sets out the full appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 12 SA Objectives.
- C.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.

C.2 SA Objective 1: Climate Change

C.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.

C.2.1.2 **Box C.2.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Climate Change.

C.2.2 Renewable energy

C.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.

C.2.3 GHG emissions

C.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.

C.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.

C.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 **Appendix E**).

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: 25/04/23]

² TCPA (2023) What is Green Infrastructure? Available at: <https://www.tcpa.org.uk/what-is-green-infrastructure/> [Date Accessed: 02/05/23]

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: 25/04/23]

Box C.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.

C.3 SA Objective 2: Air

C.3.1.1 **Box C.3.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Air.

C.3.2 Exposure to sources of air pollution

C.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 200m, the contribution of vehicle emissions from the roadside 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.

C.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.

C.3.2.3 The assessments have used UK AQMA data available from Defra⁹, and road data available from the Ordnance Survey¹⁰.

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: 25/04/23]

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: 25/04/23]

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 (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 26/04/23]

¹⁰ Ordnance Survey (2022) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 26/04/23]

C.3.3 Generation of air pollution

- C.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.
- C.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.
- C.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 **Appendix E**).

Box C.3.1: SA Objective 2: Air strategic assessment methodology

SA2 Receptor	++	+	0	+/-	-	--
AQMA	N/A	Development proposals will improve air quality within AQMAs.	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

C.4 SA Objective 3: Biodiversity, Flora and Fauna

C.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:**
 - Habitats sites (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.

C.4.1.2 **Box C.4.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, Flora and Fauna.

C.4.1.3 Data for Habitats sites, SSSIs, NNRs, ancient woodlands and LNRs is available from Natural England¹². Data for SBIs, BASs 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: 04/05/23]

¹² Natural England (2023) Natural England Open Data Geoportal. Available at: <https://naturalengland-defra.opendata.arcgis.com/> [Date accessed: 26/04/23]

C.4.2 Biodiversity and geodiversity designations

- C.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.).
- C.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.

C.4.3 Habitats sites

- C.4.3.1 Habitats sites (formerly referred to as 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 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 Habitats sites.
- C.4.3.2 The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a Habitats site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each Habitats 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 Habitats 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 Habitats sites will be tested through the Habitats Regulations Assessment (HRA) process, the findings of which will be used to inform the Regulation 19 SA. The HRA will provide further detail relating to potential impacts on Habitats 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: 26/04/23]

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.

C.4.4 Priority habitats, species and ecological networks

- C.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.
- C.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.
- C.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.
- C.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.
- C.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.
- C.4.4.6 It is assumed that mature trees and hedgerows will be retained where possible.

C.4.5 Habitat distinctiveness

- C.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.
- C.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 (2023) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 26/04/23]

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.

C.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.

C.4.5.4 Spatial data for habitat distinctiveness has been provided by the Council.

C.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 "*enable improved connections for wildlife, allowing plants, animals, nutrients and water to move from place to place and will bring wildlife closer to people*"¹⁷. At this stage of the assessment process, no information is available to inform the assessment of each site with regard to nature recovery opportunities.

Box C.4.1: SA Objective 3: Biodiversity, Flora and Fauna strategic assessment methodology

SA3 Receptor	++	+	0	+/-	-	--
Habitats site (SAC, SPA, Ramsar)	N/A	Development proposal which would be expected to enhance features within a Habitats site.	Development not anticipated to result in adverse impacts on Habitats 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 Habitats site. Likelihood of direct or indirect impacts.	Development proposal coincides with, or is located in close proximity to, a Habitats 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.
NNR	N/A	Development proposals which would	Development not anticipated to result in	It is uncertain whether the	Development could potentially	Development coincides with an NNR.

¹⁷ 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=EAIaIQobChMI7Oja5-jY_gIVqujtCh3FTQgkEAAAYASAAEgJuQ_D_BwE [Date accessed: 03/05/23]

SA3 Receptor	++	+	0	+/-	-	--
		enhance or create an NNR.	adverse impacts on NNRs.	proposed development would affect an NNR.	result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.	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.
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

SA3 Receptor	++	+	0	+/-	-	--
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.

C.5 SA Objective 4: Natural Resources and Waste

C.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.

C.5.1.2 **Box C.5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Natural Resources and Waste.

C.5.2 Previously developed land

C.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.

C.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.

C.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.

C.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 Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 26/04/23]

C.5.3 Agricultural Land Classification

- C.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.
- C.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.
- C.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.
- C.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.

C.5.4 Mineral Resources

- C.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.
- C.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: 26/04/23]

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: 26/04/23]

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: 27/04/23]

C.5.5 Contaminated land

- C.5.5.1 Contaminated land is land that has been polluted and is therefore potentially unsafe for development unless the contamination is removed.
- C.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*”.
- C.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.
- C.5.5.4 Data for contaminated land and historic landfill sites has been provided by the Council.

C.5.6 Waste

- C.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 NLBC. 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.
- C.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.
- C.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.
- C.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 **Appendix E**).
- C.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]

- C.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.
- C.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).
- C.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).
- C.5.6.9 Approximate travel times have been derived through use of Google maps, and with reference to radius maps from TravelTime map demo²⁵.
- C.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 C.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.
Household Waste	Nearest Recycling and	Nearest Recycling and	Development proposals for non-	N/A	Nearest Recycling and	Site would directly affect waste

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: 27/04/23]

²⁵ TravelTime Map Demo. Available at: <https://app.traveltime.com/reachable/within/10/minutes/public-transport/radius> [Date accessed: 02/05/23]

SA4 Receptor	++	+	0	+/-	-	--
	Household Waste Site within 10 min drive time.	Household Waste Site 10-20 min drive time (10-30 mins in rural areas).	residential use would be likely to result in a negligible impact on household waste.		Household Waste Site more than 20 min drive time (30 mins in rural areas).	management facilities or infrastructure

C.6 SA Objective 5: Flooding

C.6.1.1 **Box C.6.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Flooding.

C.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).

C.6.2 Fluvial flooding

C.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.

C.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.

C.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.

C.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 (2013) Flood Map for Planning Risk. Available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change> [Date Accessed: 02/05/23]

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: 25/04/23]

C.6.3 Surface water flooding

C.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.

C.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.

C.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.

C.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.

C.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 C.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: 25/04/23]

C.7 SA Objective 6: Water

C.7.1.1 **Box C.7.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Water.

C.7.1.2 The Local Plan should seek to promote the protection of inland surface waters and groundwater.

C.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.

C.7.2 Watercourses

C.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.

C.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.

C.7.3 Groundwater

C.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.

C.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;

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: 26/04/23]

³¹ Wild Trout Trust. Buffer Zones. Available at: <https://www.wildtrout.org/content/buffer-zones> [Date accessed: 26/04/23]

³² Ordnance Survey (2022) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 26/04/23]

- Outer Zone (Zone II) – 400-day travel time; and
- Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.

C.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.

C.7.3.4 SPZ data is available from the Environment Agency³³.

C.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 Muckleston. No reasonable alternative sites coincide with this SgZ and as such the SA assessment has not included reference to this receptor.

C.7.4 Water resources

C.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.

C.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.

C.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 Water Cycle Study³⁵.

C.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 (2023) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 26/04/23]

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: 02/05/23]

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/downloads/download/276/water-cycle-study-2020> [Date accessed: 02/05/23]

Box C.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.

C.8 SA Objective 7: Cultural Heritage

- C.8.1.1 **Box C.8.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Cultural Heritage.
- C.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.
- C.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).
- C.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.
- C.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.
- C.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.
- C.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.
- C.8.1.8 Newcastle-under-Lyme Borough contains several locally important (non-designated) features³⁶. However, spatial data has not been available at this stage to inform the assessments on a site-by-site basis.

³⁶ 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]

C.8.1.9 It is anticipated that NLBC will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

C.8.1.10 Data for heritage assets³⁷, including the Heritage at Risk Register³⁸, are available from Historic England.

Box C.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

³⁷ Historic England (2022) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 21/12/22]

³⁸ 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.

C.9 SA Objective 8: Landscape

C.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.

C.9.1.2 **Box C.9.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Landscape.

C.9.2 National Park

C.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.

C.9.3 Green Belt

C.9.3.1 As part of the evidence to inform the former joint Local Plan with Stoke-on-Trent Council, NLBC commissioned a Green Belt Assessment to review the potential release of Green Belt sites for development³⁹. 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.

C.9.3.2 The Green Belt Assessment classified land parcels as making a 'strong', 'moderate' or 'weak' contribution to the five purposes of the Green Belt.

³⁹ 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: 27/04/23]

C.9.3.3 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.

C.9.3.4 It should be acknowledged that Green Belt designations do not necessarily relate to high quality or sensitive landscapes.

C.9.4 Landscape Character

C.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)⁴⁰. 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.

C.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.

C.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.

C.9.5 Landscape Sensitivity

C.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)⁴¹ within the context of the appropriate Landscape Character Areas (LCAs).

C.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.

C.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).

⁴⁰ 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]

⁴¹ 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]

C.9.6 Views

- C.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.
- C.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.
- C.9.6.3 Views have been identified through the use of aerial photography and Google Maps⁴². 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.

C.9.7 Urban Sprawl/ Coalescence

- C.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.
- C.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.

C.9.8 TPOs

- C.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 C.9.1: SA Objective 8: Landscape and Townscape strategic assessment methodology

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	Development proposals within areas defined as	N/A	Development proposals within areas defined as	Development proposals within areas defined as

⁴² Google Maps (2023) Available at: <https://www.google.co.uk/maps>

SA8 Receptor	++	+	0	+/-	-	--
Green Belt	N/A	Low Sensitivity. Development proposals located outside of the Green Belt.	'N/A' for sensitivity. Weak overall contribution to the Green Belt.	Development proposals located within the Green Belt but outside of the Green Belt Assessment study area.	Medium Sensitivity. Moderate overall contribution to the Green Belt.	High Sensitivity. 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
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

C.10 SA Objective 9: Health and Wellbeing

- C.10.1.1 **Box C.10.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.
- C.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.
- C.10.1.3 The assessments under this objective as set out in **Box C.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.

C.10.2 Hospitals

- C.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.
- C.10.2.2 In line with Barton *et al.*'s sustainable distances⁴³, 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.

C.10.3 GP surgery

- C.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.

⁴³ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

C.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 facilities⁴⁴. 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:

- 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.

C.10.4 Leisure facilities

C.10.4.1 Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise.

C.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 facilities⁴⁵. 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.

C.10.4.3 Data for leisure and recreation centres has been provided by the Council.

C.10.5 Open / green space

C.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.

⁴⁴ 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: 03/05/23]

⁴⁵ 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: 03/05/23]

- C.10.5.2 Data for open spaces has been provided by the Council, derived from the Open Space Strategy (2022)⁴⁶. 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.
- C.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 tool⁴⁷. 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.
- C.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.
- C.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.

C.10.6 Green and blue infrastructure

- C.10.6.1 The Local Plan should seek to maintain and enhance the quality, accessibility and connectivity of blue and green infrastructure.
- C.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 development⁴⁸. 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.

⁴⁶ 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]

⁴⁷ Natural England (2023) Green Infrastructure Map. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx> [Date accessed: 04/05/23]

⁴⁸ 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=EAIaIQobChMI7Oja5-jY_gIVqujtCh3fTQgkEAAYASAAEgJuQ_D_BwE [Date accessed: 03/05/23]

Box C.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.

C.11 SA Objective 10: Equality

C.11.1.1 **Box C.11.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Equality.

C.11.2 Housing provision

C.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.

C.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 stability⁴⁹.

C.11.2.3 Estimated housing capacity for each reasonable alternative site has been provided by NLBC.

C.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 NLBC'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.

C.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.

C.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.

C.11.3 Deprivation and community

C.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.

C.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.

⁴⁹ 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

- C.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.
- C.11.3.4 An assessment of current land use has been made through reference to aerial photography and the use of Google Maps⁵⁰.
- C.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)⁵¹, 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 MHCLG⁵².
- C.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.
- C.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.

C.11.4 Crime

- C.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.
- C.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' principles⁵³. Such opportunities will be evaluated through the policy assessments (see **Appendix E**).

⁵⁰ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

⁵¹ 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/IOD2019_Statistical_Release.pdf [Date accessed: 02/05/23]

⁵² 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: 02/05/23]

⁵³ Secured by Design: Homes 2023. Available at: https://www.securedbydesign.com/images/HOMES_GUIDE_2023_web.pdf [Date accessed: 02/05/23]

Box C.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.

C.12 SA Objective 11: Transport and Accessibility

C.12.1.1 **Box C.12.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Transport and Accessibility.

C.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 C.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.

C.12.2 Bus stop

C.12.2.1 It is desirable for site end users to be situated within walking distance of a bus stop.

C.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 facilities⁵⁴. 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.

C.12.2.3 Bus stop data has been provided by the Council.

C.12.3 Train station

C.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.

⁵⁴ 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]

C.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 facilities⁵⁵. 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.

C.12.3.3 Train station data has been provided by the Council.

C.12.4 Pedestrian access

C.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.

C.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.

C.12.4.3 Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps⁵⁶. Data for PRoWs has been provided by the Council.

C.12.5 Cycle access

C.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.

⁵⁵ 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]

⁵⁶ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

C.12.5.2 Data for local cycle routes has been provided by the Council and considered alongside national cycle route data available from Sustrans⁵⁷.

C.12.6 Access to schools

C.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.

C.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 facilities⁵⁸. 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.

C.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.

C.12.6.4 Data for schools has been provided by the Council.

⁵⁷ Sustrans Open Data Portal. Available at: <https://data-sustrans-uk.opendata.arcgis.com/> [Date accessed: 04/05/23]

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 [Date accessed: 03/05/23]

C.12.7 Access to employment opportunities

C.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.

C.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 facilities⁵⁹. 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.

C.12.8 Access to local services

C.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.

C.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 facilities⁶⁰. 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

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](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: 03/05/23]

⁶⁰ 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: 03/05/23]

- Beyond 800m, a minor negative impact on access to local services would be expected.

Box C.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.	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.	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
Access to local services	Walking distance to local services 200m or less.	Walking distance to local services 400m.	Walking distance to local services 800m.	N/A	Over 800m walking distance to local services.	N/A

C.13 SA Objective 12: Economy

- C.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.
- C.13.1.2 **Box C.13.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Economy.
- C.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.
- C.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 Maps⁶¹.

Box C.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.

⁶¹ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

Appendix D: Reasonable Alternative Site Assessments

Appendix D Contents

D.1	Introduction	1
D.2	SA Objective 1: Climate Change	26
D.3	SA Objective 2: Air.....	30
D.4	SA Objective 3: Biodiversity, Flora and Fauna	34
D.5	SA Objective 4: Natural Resources and Waste.....	41
D.6	SA Objective 5: Flooding	46
D.7	SA Objective 6: Water.....	50
D.8	SA Objective 7: Cultural Heritage	54
D.9	SA Objective 8: Landscape	59
D.10	SA Objective 9: Health and Wellbeing.....	65
D.11	SA Objective 10: Equality	70
D.12	SA Objective 11: Transport and Accessibility	75
D.13	SA Objective 12: Economy	81

Tables

Table D.1.1: Reasonable alternative sites in Newcastle-under-Lyme Borough.....	3
Table D.2.1: Sites impact matrix for SA Objective 1 – Climate Change.....	26
Table D.3.1: Sites impact matrix for SA Objective 2 – Air.....	30
Table D.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, Flora and Fauna	37
Table D.5.1: Sites impact matrix for SA Objective 4 – Natural Resources and Waste	42
Table D.6.1: Sites impact matrix for SA Objective 5 – Flooding	46
Table D.7.1: Sites impact matrix for SA Objective 6 – Water.....	50
Table D.8.1: Sites impact matrix for SA Objective 7 – Cultural heritage	55
Table D.9.1: Sites impact matrix for SA Objective 8 – Landscape	61
Table D.10.1: Sites impact matrix for SA Objective 9 – Health and Wellbeing	66
Table D.11.1: Sites impact matrix for SA Objective 10 – Equality	71
Table D.12.1: Sites impact matrix for SA Objective 11 – Transport and Accessibility	77
Table D.13.1: Sites impact matrix for SA Objective 12 – Economy	81

Figures

Figure D.1.1: Reasonable alternative sites identified within Newcastle-under-Lyme	2
Figure D.1.2: Cluster of reasonable alternative sites identified within Audley ward	12
Figure D.1.3 Cluster of reasonable alternative sites identified within Clayton and Westbury Park & Northwood ward	13
Figure D.1.4 Cluster of reasonable alternative sites identified within Crackley Bank, Red Street and, Holditch & Chesterton ward	14
Figure D.1.5 Cluster of reasonable alternative sites identified within Cross Heath and Knutton ward	15
Figure D.1.6 Cluster of reasonable alternative sites identified within Keele ward	16
Figure D.1.7 Cluster of reasonable alternative sites identified within Kidsgrove and Ravenscliffe ward	17
Figure D.1.8 Cluster of reasonable alternative sites identified within Loggerheads ward	18
Figure D.1.9 Cluster of reasonable alternative sites identified within Madeley & Betley ward.....	19
Figure D.1.10 Cluster of reasonable alternative sites identified within Maer & Whitmore ward	20
Figure D.1.11 Cluster of reasonable alternative sites identified within Newchapel & Mow Cop ward.....	21
Figure D.1.12 Cluster of reasonable alternative sites identified within Silverdale ward	22
Figure D.1.13 Cluster of reasonable alternative sites identified within Talke & Butt Lane ward.....	23
Figure D.1.14 Cluster of reasonable alternative sites identified within Thistleberry ward.....	24
Figure D.1.15 Cluster of reasonable alternative sites identified within Town and May Bank ward ...	25

D.1 Introduction

D.1.1 Overview

D.1.1.1 A total of 141 reasonable alternative sites have been identified within Newcastle-under-Lyme Borough (see **Table D.1.1**). This includes:

- 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 proposed use is uncertain (either residential or employment); and
- Seven sites to be considered for Gypsy and Traveller use.

D.1.1.2 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).

D.1.1.3 This Regulation 18 SA Report has considered all reasonable alternative sites in the same way using the SA Framework, irrespective of their size or location. At this stage, the assessment has been carried out using red line boundary and site proposal information provided by the Council, as set out in **Table D.1.1**.

D.1.1.4 Likely sustainability impacts have been set out in Tables D.2.1 – D.13.1 within each SA Objective chapter, in accordance with the methodology set out in Chapter 2 of the main SA Report and the topic-specific methodology as set out in **Appendix C**.

D.1.1.5 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 **section 7.3** of the main SA Report (**Volume 2**).

D.1.1.6 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 **Figures D.1.2 – D.1.15**.

D.1.1.7 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 the Council, as well as expert judgement.

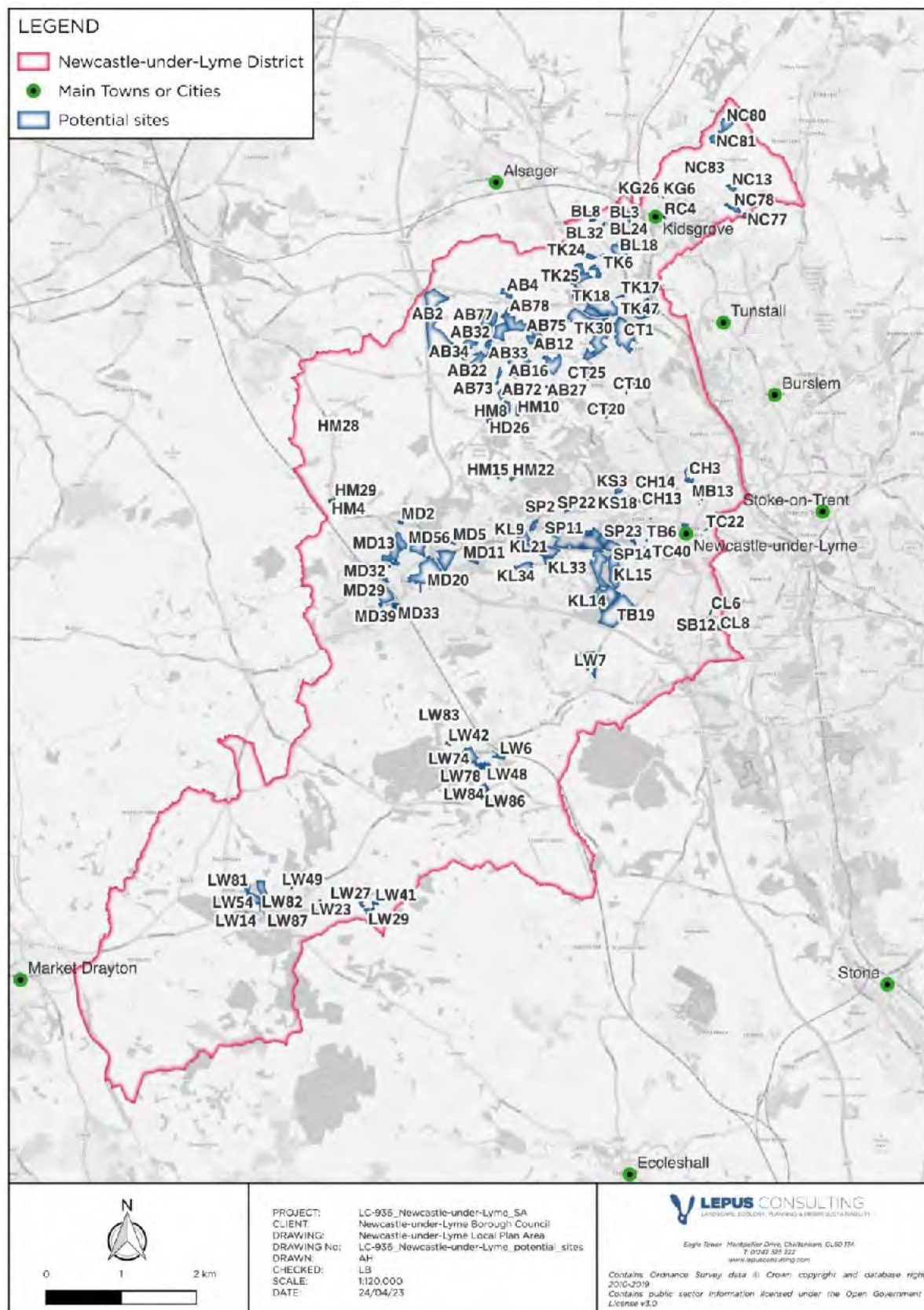


Figure D.1.1: Reasonable alternative sites identified within Newcastle-under-Lyme

Table D.1.1: Reasonable alternative sites in Newcastle-under-Lyme Borough

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
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
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
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

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
HM22	1.66	Audley	Land adj Holly House, Crackley Lane, Scot Hay	Housing	42	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
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
CT25	8.27	Crackley Bank, Red Street, Holditch & Chesterton	Land off Audley Rd, Chesterton	Housing	331	N/A
CH3	3.80	Cross Heath & Knutton	Land at Hoon Avenue, Newcastle	Housing	106	N/A
CH13	0.59	Cross Heath & Knutton	Castletown Grange, Douglas Road, Cross Heath	Housing	-19	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
CH14	0.69	Cross Heath & Knutton	Maryhill Day Centre, Wilmott Drive, Cross Heath	Housing	30	N/A
KS3	3.76	Cross Heath & Knutton	Land at Blackbank Road, Knutton (adjacent Knutton Children's Centre)	Housing	150	N/A
KS11	0.57	Cross Heath & Knutton	Knutton Community Centre, High Street Knutton	Housing	9	N/A
KS17	2.33	Cross Heath & Knutton	Knutton Recreation Centre, Knutton Lane	Housing	59	N/A
KS18	0.12	Cross Heath & Knutton	Land North of Lower Milehouse Lane, Knutton	Housing	10	N/A
KS19	0.08	Cross Heath & Knutton	Knutton Lane	Housing	5	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
KL13	26.13	Keele	Keele Science Park Phase 3, University of Keele	Mixed use	224	11.21
KL14	26.25	Keele	Land South-East of Keele University	Mixed use	56	2.8
KL15	18.05	Keele	Land South of A525 between Keele University and Newcastle	Mixed use	260	13.02
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
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
KG6	0.18	Kidsgrove & Ravenscliffe	William Road, Kidsgrove (site of the Galley PH)	Housing	10	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
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
LW53	8.35	Loggerheads	Land corner of Muckleston Wood Lane & Rock Lane, Loggerheads	Housing	134	N/A
LW54	9.16	Loggerheads	Land South of Muckleston Road, Loggerheads	Housing	147	N/A
LW81	2.29	Loggerheads	Gravel Bank, Muckleston Road, Loggerheads	Housing	37	N/A
LW82	0.98	Loggerheads	Sewage Works, Market Drayton Road, Loggerheads	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, Wrinchill	Housing	29	N/A
HM28	0.23	Madeley & Betley	Land off East Lawns, Betley	Housing	6	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
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

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
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
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	1100	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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
BL3	9.28	Talke & Butt Lane	Land at Slacken Lane, Talke (1)	Housing	107	N/A
BL8	1.42	Talke & Butt Lane	Land adjacent to roundabout at West Avenue, Kidsgrove	Mixed use	48	1.21
BL18	13.45	Talke & Butt Lane	Clough Hall Playing Fields, Talke	Housing	285	N/A
BL24	0.27	Talke & Butt Lane	Land adjacent 31 Banbury Street, Talke	Housing	10	N/A
BL32	0.85	Talke & Butt Lane	Land at Congleton Road, Butt Lane	Mixed use	29	0.72
TK6	0.46	Talke & Butt Lane	Site at Coalpit Hill, Talke	Housing	15	N/A
TK10	5.33	Talke & Butt Lane	Land at Crown Bank, Talke	Housing	170	N/A
TK17	1.24	Talke & Butt Lane	Land off St Martins Road, Talke	Housing	42	N/A
TK18	32.51	Talke & Butt Lane	Jamage South, Land North of A500	Mixed use	1040	26.01
TK24	1.38	Talke & Butt Lane	Land off Coppice Road, Talke (1)	Housing	47	N/A
TK25	22.79	Talke & Butt Lane	Land South of Audley Road and West of Pit Lane	Mixed use	729	18.23
TK27	2.82	Talke & Butt Lane	Land off Coppice Road, Talke (2)	Housing	90	N/A
TK30	66.37	Talke & Butt Lane	Land off Talke Road and A500, Talke	Mixed use	394	51.98
TK45	6.65	Talke & Butt Lane	Land North of Peacock Hay Road, Chatterley Valley	Employment	N/A	4.12
TK46	8.26	Talke & Butt Lane	Jamage North Reclamation Site, Talke	Housing	187	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
TK47	21.14	Talke & Butt Lane	Land North of Peacock Hay Road, Chatterley Valley	Employment	N/A	15.67
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
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
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 (West), Holditch& Chesterton	Gypsy and Traveller	N/A	N/A

Site Reference	Site Area (ha)	Cluster (ward)	Address	Proposed site use	Housing capacity	Developable Employment Area (ha)
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

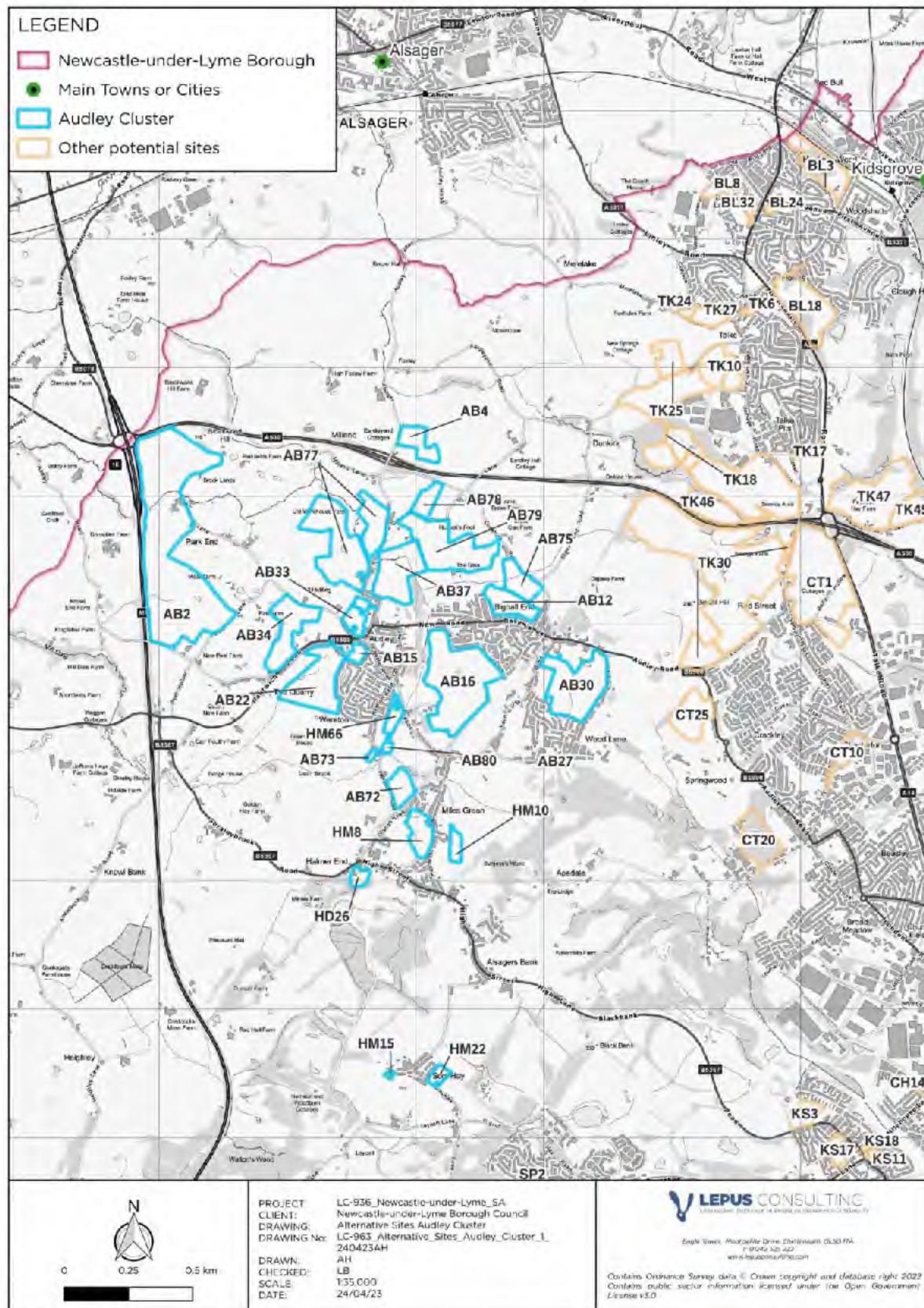


Figure D.1.2: Cluster of reasonable alternative sites identified within Audley







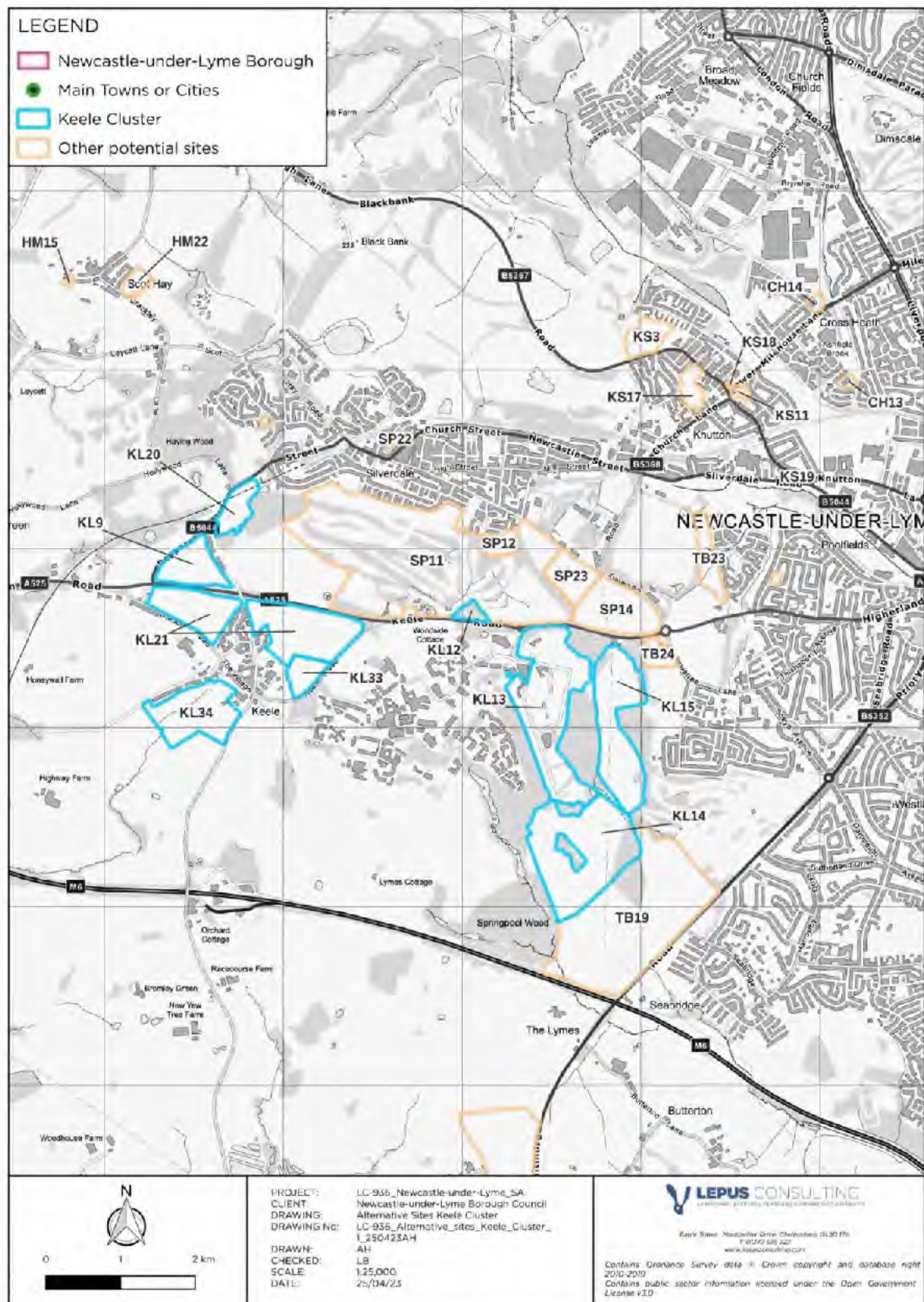


Figure D.1.6 Cluster of reasonable alternative sites identified within Keele



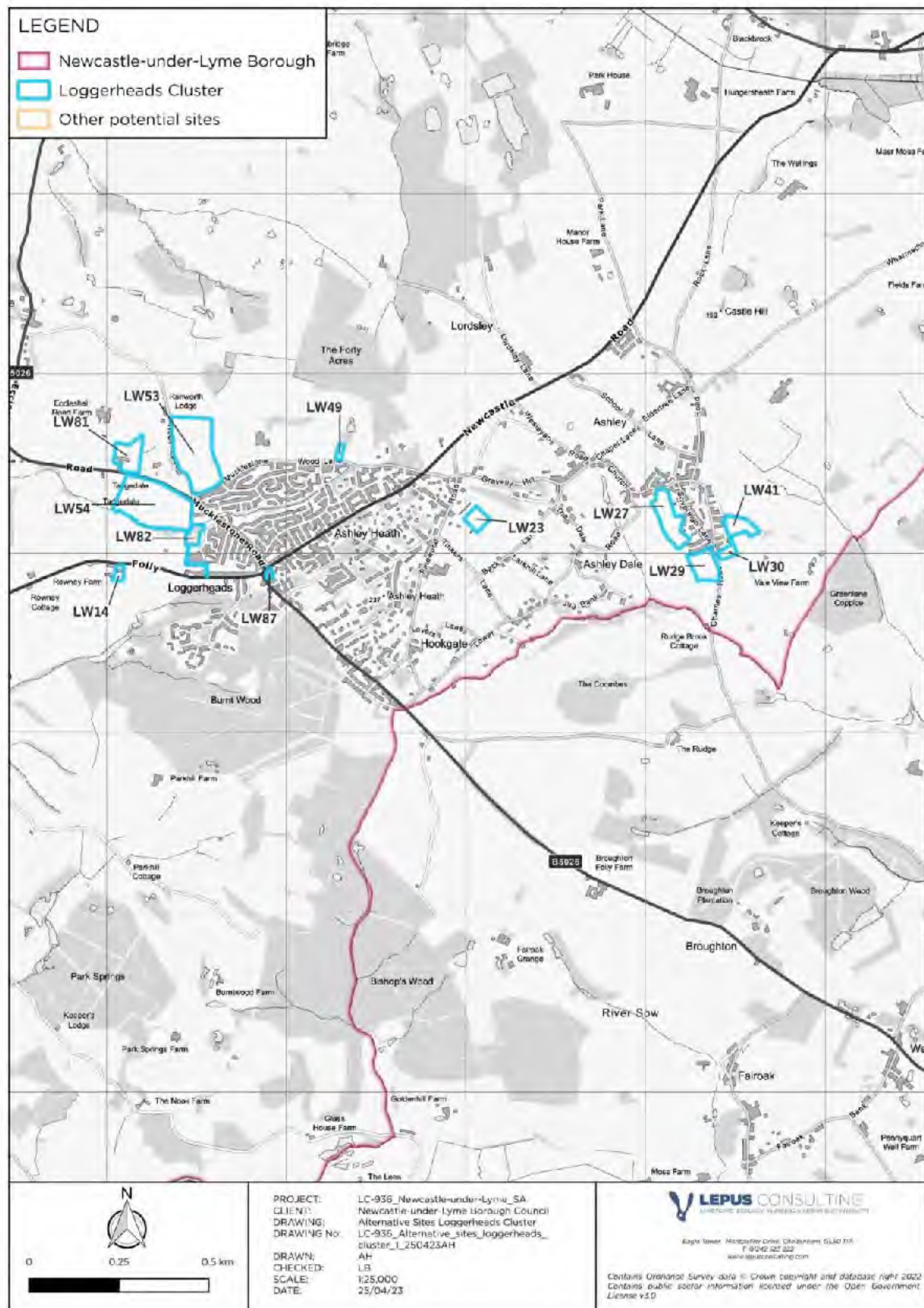
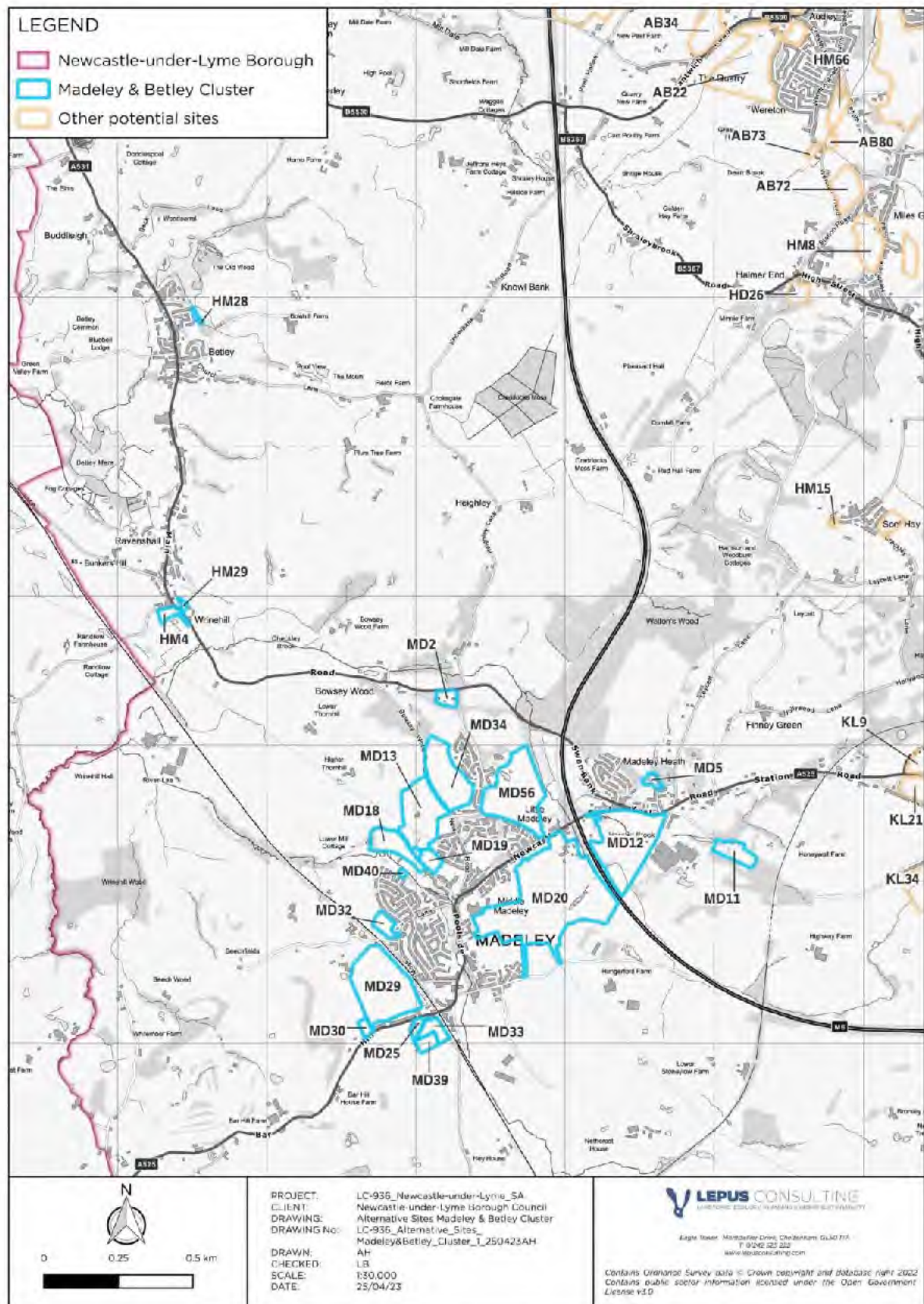


Figure D.1.8 Cluster of reasonable alternative sites identified within Loggerheads







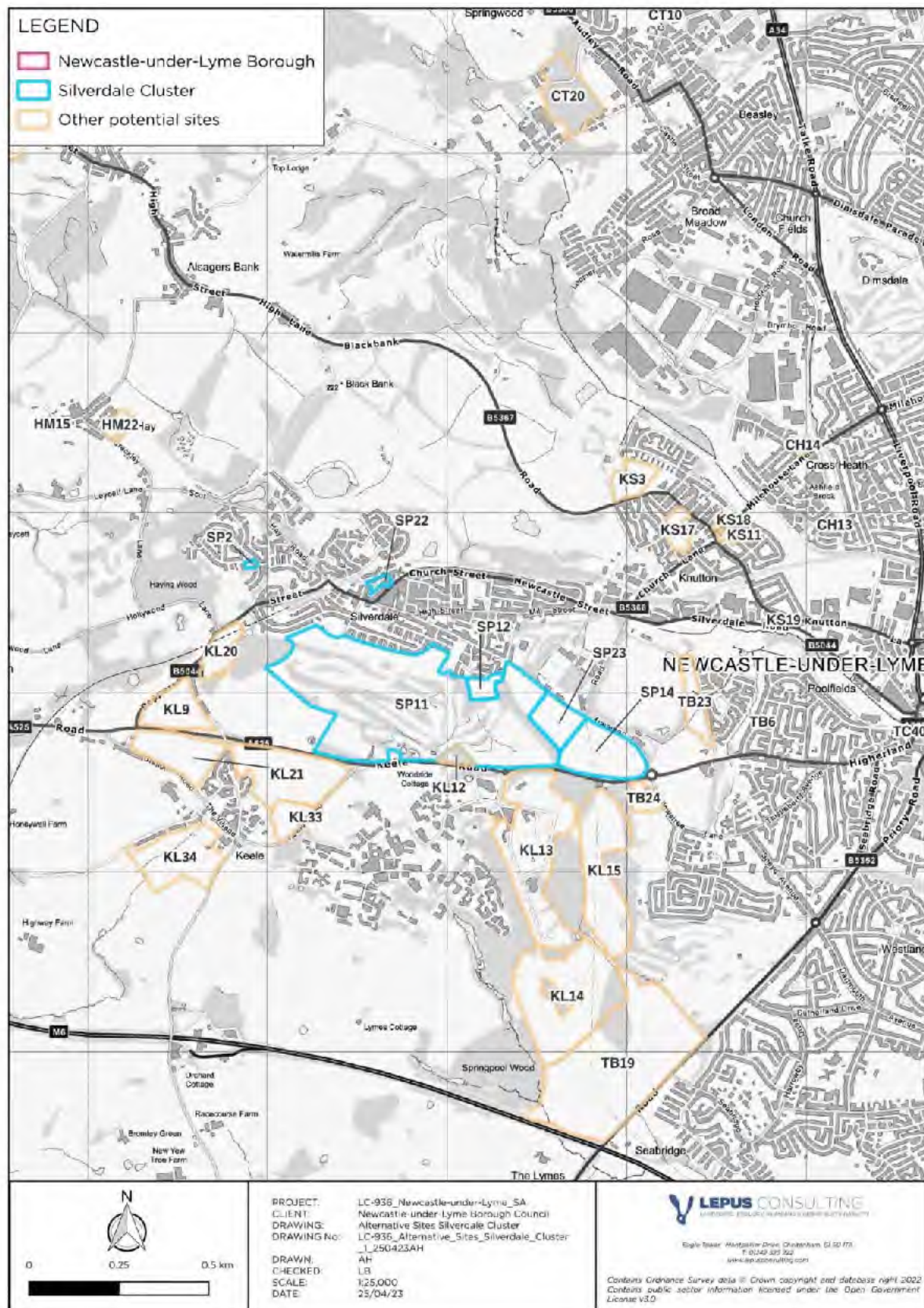


Figure D.1.12 Cluster of reasonable alternative sites identified within Silverdale

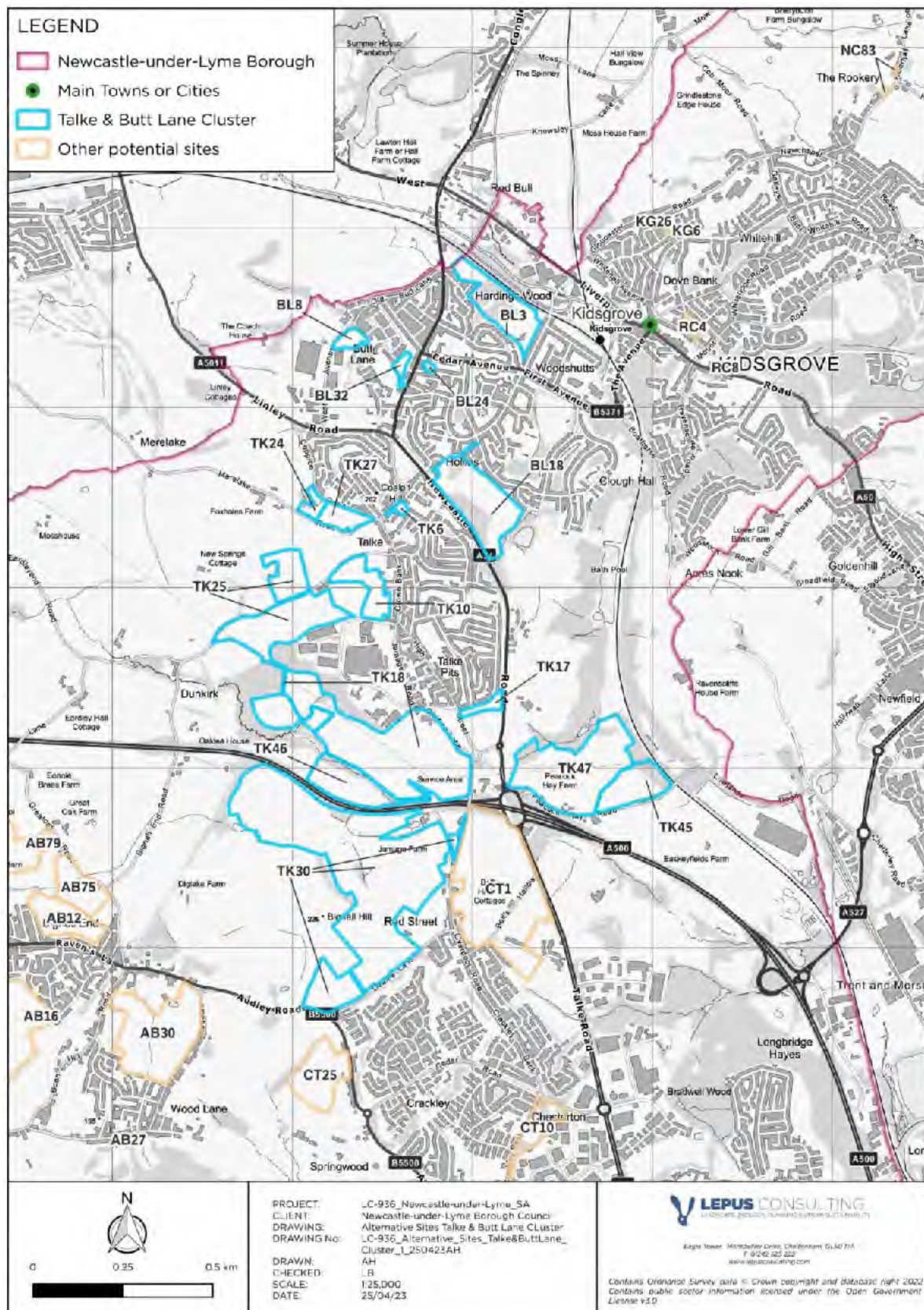


Figure D.1.13 Cluster of reasonable alternative sites identified within Talke & Butt Lane





D.2 SA Objective 1: Climate Change

D.2.1 Opportunities for Renewable / Low Carbon Energy

- D.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.
- D.2.1.2 12 sites coincide with regions of County Council-owned 'LZC opportunity areas', thus indicating that the proposed development on the site could result in the loss of land with high potential suitability for renewable energy developments. As a result, the proposed development on these sites for housing/employment uses could result in a minor negative impact on SA Objective 1 i.e., Climate Change.
- D.2.1.3 On the other hand, 60 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.
- D.2.1.4 For the rest of the 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 or would depend upon implementation.

Table D.2.1: Sites impact matrix for SA Objective 1 – Climate Change

Site Ref	Proposed Site Use	Renewable Energy
AB2	Employment	+
AB4	Mixed use	+
AB12	Housing	-
AB15	Housing	+/-
AB16	Housing	-
AB22	Housing	+
AB27	Housing	+
AB30	Mixed use (housing, education and sports)	+
AB32	Housing	+
AB33	Housing	-
AB34	Housing	-
AB37	Housing	-
AB72	Housing	+
AB73	Housing	+
AB75	Mixed use	+
AB77	Mixed use	+
AB78	Housing	+
AB79	Housing	+
HD26	Housing	+
HM8	Housing	+/-
HM10	Housing	+/-

Site Ref	Proposed Site Use	Renewable Energy
HM15	Housing	+
HM22	Housing	+
HM66	Housing	+
CL6	Housing	+/-
CL8	Housing	+
SB12	Housing	+/-
CT1	Housing	+
CT10	Employment or Housing	+/-
CT20	Employment	+/-
CT25	Housing	+
CH3	Housing	-
CH13	Housing	+/-
CH14	Housing	-
KS3	Housing	-
KS11	Housing	+/-
KS17	Housing	-
KS18	Housing	+/-
KS19	Housing	+/-
KL9	Housing	+
KL12	Housing	+/-
KL13	Mixed use	+
KL14	Mixed use	+
KL15	Mixed use	+
KL20	Housing	+
KL21	Mixed use	+
KL33	Housing	+
KL34	Housing	+
KG6	Housing	+/-
KG26	Housing	+/-
RC4	Housing	+/-
RC8	Housing	+/-
LW14	Housing	+/-
LW23	Housing	+/-
LW27	Housing	+/-
LW29	Housing	+/-
LW30	Housing	+/-
LW41	Housing	+/-
LW49	Housing	+/-
LW53	Housing	+/-
LW54	Housing	+/-
LW81	Housing	+/-
LW82	Housing	+/-
LW87	Housing	+/-
HM4	Housing	+/-
HM28	Housing	+/-
HM29	Housing	+/-
MD2	Housing	+
MD5	Housing	+/-
MD11	Mixed use	+

Site Ref	Proposed Site Use	Renewable Energy
MD12	Mixed use	+
MD13	Housing	+
MD18	Housing	+
MD19	Housing	+
MD20	Mixed use (housing, education and sports)	+
MD25	Housing	+/-
MD29	Housing	+/-
MD30	Housing	+/-
MD32	Housing	+/-
MD33	Housing	+/-
MD34	Housing	+
MD39	Housing	+/-
MD40	Housing	+/-
MD56	Housing	+
LW6	Mixed use	+/-
LW7	Housing	+
LW9	Housing	+/-
LW38	Housing	+/-
LW42	Housing	+/-
LW48	Housing	+/-
LW74	Housing	+/-
LW78	Housing	+/-
LW83	Housing	+/-
LW84	Housing	+/-
LW86	Mixed use	+/-
NC13	Housing	+
NC77	Mixed use	+
NC78	Housing	+
NC80	Housing	+
NC81	Housing	+
NC83	Housing	+
SP2	Housing	+/-
SP11	Housing	+
SP12	Housing	+
SP14	Housing	+
SP22	Housing	+/-
SP23	Housing	+
BL3	Housing	+/-
BL8	Mixed use	+/-
BL18	Housing	-
BL24	Housing	+/-
BL32	Mixed use	+/-
TK6	Housing	-
TK10	Housing	+
TK17	Housing	+
TK18	Mixed use	+
TK24	Housing	+
TK25	Mixed use	+
TK27	Housing	+

Site Ref	Proposed Site Use	Renewable Energy
TK30	Mixed use	+
TK45	Employment	+
TK46	Housing	+
TK47	Employment	+
TB6	Housing	+/-
TB19	Mixed use	+
TB23	Housing	+/-
TB24	Housing	+/-
MB12	Housing	+/-
MB13	Housing	+/-
MB15	Housing	+/-
TC7	Mixed use	-
TC22	Mixed use	+/-
TC40	Housing	+/-
TC45	Employment	+/-
Site 1	Gypsy and Traveller	+/-
Site 2	Gypsy and Traveller	+/-
Site 3	Gypsy and Traveller	+
Site 4	Gypsy and Traveller	+/-
Site 5	Gypsy and Traveller	+
Site 6	Gypsy and Traveller	+/-
Site 7	Gypsy and Traveller	+/-

D.3 SA Objective 2: Air

D.3.1 Air Quality Management Area

- D.3.1.1 'Kidsgrove', 'Maybank, Wolstanton, Porthill', 'Newcastle-under-Lyme Town', and 'Little Madeley' are the AQMAs that lie within the Newcastle-under-Lyme Borough boundary. Besides, the borough also borders Stoke-on-Trent in the east which is wholly designated as an AQMA. As a result, 14 sites in Newcastle & Mow Cop, Town Centre, Madeley & Betley and Kidsgrove clusters either coincide or are located within 200m of these designated AQMAs.
- D.3.1.2 The proposed development at these 14 sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.
- D.3.1.3 For the proposed development on the sites which are over 200m away from an AQMA, a negligible impact would be expected.

D.3.2 Main Road

- D.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 boundary. Moreover, the M6 motorway passes through several site clusters (Audley, Keele, Madeley & Betley, and Maer & Whitmore). As a result, 66 sites lie either adjacent or within 200m of these major roads.
- D.3.2.2 The proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality at these sites. For the proposed development on the sites which are over 200m away from a main road, a negligible impact on transport associated air pollution would be expected.

Table D.3.1: Sites impact matrix for SA Objective 2 – Air

Site Ref	Proposed Site Use	AQMA	Main Road
AB2	Employment	0	-
AB4	Mixed use	0	-
AB12	Housing	0	0
AB15	Housing	0	0
AB16	Housing	0	0
AB22	Housing	0	0
AB27	Housing	0	0
AB30	Mixed use (housing, education and sports)	0	0
AB32	Housing	0	0
AB33	Housing	0	0
AB34	Housing	0	0
AB37	Housing	0	0
AB72	Housing	0	0
AB73	Housing	0	0
AB75	Mixed use	0	0

Site Ref	Proposed Site Use	AQMA	Main Road
AB77	Mixed use	0	0
AB78	Housing	0	-
AB79	Housing	0	0
HD26	Housing	0	0
HM8	Housing	0	-
HM10	Housing	0	0
HM15	Housing	0	0
HM22	Housing	0	0
HM66	Housing	0	0
CL6	Housing	0	0
CL8	Housing	-	0
SB12	Housing	0	-
CT1	Housing	0	-
CT10	Employment or Housing	0	0
CT20	Employment	0	0
CT25	Housing	0	0
CH3	Housing	0	0
CH13	Housing	0	0
CH14	Housing	0	0
KS3	Housing	0	0
KS11	Housing	0	0
KS17	Housing	0	0
KS18	Housing	0	0
KS19	Housing	0	0
KL9	Housing	0	-
KL12	Housing	0	-
KL13	Mixed use	0	-
KL14	Mixed use	0	0
KL15	Mixed use	0	-
KL20	Housing	0	-
KL21	Mixed use	0	-
KL33	Housing	0	0
KL34	Housing	0	0
KG6	Housing	0	-
KG26	Housing	0	0
RC4	Housing	-	-
RC8	Housing	-	-
LW14	Housing	0	0
LW23	Housing	0	0
LW27	Housing	0	0
LW29	Housing	0	0
LW30	Housing	0	0
LW41	Housing	0	0
LW49	Housing	0	0
LW53	Housing	0	0
LW54	Housing	0	-
LW81	Housing	0	0
LW82	Housing	0	0
LW87	Housing	0	-

Site Ref	Proposed Site Use	AQMA	Main Road
HM4	Housing	0	-
HM28	Housing	0	-
HM29	Housing	0	-
MD2	Housing	0	-
MD5	Housing	0	-
MD11	Mixed use	0	0
MD12	Mixed use	-	-
MD13	Housing	0	0
MD18	Housing	0	0
MD19	Housing	0	0
MD20	Mixed use (housing, education and sports)	-	-
MD25	Housing	0	-
MD29	Housing	0	-
MD30	Housing	0	-
MD32	Housing	0	0
MD33	Housing	0	-
MD34	Housing	0	0
MD39	Housing	0	-
MD40	Housing	0	0
MD56	Housing	0	-
LW6	Mixed use	0	-
LW7	Housing	0	-
LW9	Housing	0	-
LW38	Housing	0	-
LW42	Housing	0	0
LW48	Housing	0	-
LW74	Housing	0	-
LW78	Housing	0	-
LW83	Housing	0	0
LW84	Housing	0	-
LW86	Mixed use	0	-
NC13	Housing	0	0
NC77	Mixed use	-	0
NC78	Housing	-	0
NC80	Housing	0	0
NC81	Housing	0	0
NC83	Housing	0	0
SP2	Housing	0	0
SP11	Housing	0	-
SP12	Housing	0	0
SP14	Housing	0	-
SP22	Housing	0	0
SP23	Housing	0	-
BL3	Housing	-	-
BL8	Mixed use	0	0
BL18	Housing	0	-
BL24	Housing	0	-
BL32	Mixed use	0	-
TK6	Housing	0	0

Site Ref	Proposed Site Use	AQMA	Main Road
TK10	Housing	0	0
TK17	Housing	0	-
TK18	Mixed use	0	-
TK24	Housing	0	0
TK25	Mixed use	0	0
TK27	Housing	0	0
TK30	Mixed use	0	-
TK45	Employment	0	-
TK46	Housing	0	-
TK47	Employment	0	-
TB6	Housing	0	-
TB19	Mixed use	0	-
TB23	Housing	0	-
TB24	Housing	0	-
MB12	Housing	-	-
MB13	Housing	0	-
MB15	Housing	0	-
TC7	Mixed use	-	-
TC22	Mixed use	-	-
TC40	Housing	-	-
TC45	Employment	-	-
Site 1	Gypsy and Traveller	0	-
Site 2	Gypsy and Traveller	0	0
Site 3	Gypsy and Traveller	0	0
Site 4	Gypsy and Traveller	0	0
Site 5	Gypsy and Traveller	0	-
Site 6	Gypsy and Traveller	0	-
Site 7	Gypsy and Traveller	-	0

D.4 SA Objective 3: Biodiversity, Flora and Fauna

D.4.1 Habitats Sites

- D.4.1.1 Habitats sites (formerly referred to as 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 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 Habitats sites.
- D.4.1.2 Two Habitats sites are located within the boundary of Newcastle-under-Lyme Borough, 'Midland Meres and Moses- Phase 1' and 'Midland Meres and Moses- Phase 2'. No ZoI has 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.
- D.4.1.3 It should be noted that the impact of reasonable alternative sites on Habitats sites will be tested through the Habitats Regulations Assessment (HRA) process, the findings of which will be used to inform the Regulation 19 SA. The HRA will provide further detail relating to potential impacts on Habitats sites within and surrounding the Plan area.

D.4.2 Sites of Special Scientific Interest

- D.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.
- D.4.2.2 Seven sites which are proposed for residential use are located within IRZs which indicate that the developments should be consulted on with Natural England, and therefore could potentially have a minor negative impact on the nearby SSSIs.
- D.4.2.3 Sites HM28, HM29 and LW86 lie wholly, whereas sites LW53 and HM4 lie partially, within an IRZ which states "*any residential development with total gain in residential units*" should be consulted on with Natural England.
- D.4.2.4 Owing to the proposed development of more than 50 dwellings at site LW54 and more than 100 dwellings at site NC80, they are also likely to have minor negative impact on the nearby SSSIs as they coincide with the respective IRZs.

D.4.3 National Nature Reserves

- D.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 'Wynbunbury Moss' NNR in the west (approximately 4.3km away). There are no sites within Newcastle-under-Lyme located within close proximity to these NNRs, and therefore the proposed development at all the sites would be expected to have a negligible impact.

D.4.4 Ancient Woodland

- D.4.4.1 There are several patches of ancient woodland in Newcastle-under-Lyme Borough and therefore many sites either lie adjacent or in proximity to them. Site TK46 partially coincides with 'Parrot's Drumble' ancient woodland and therefore the proposed development on the site could result in a direct major negative impact on this ancient woodland.
- D.4.4.2 Seven of the sites (CL8, KL15, MD2, MD34, TK 18, TK 25 and TK47) which are adjacent and 51 of the sites which are in proximity to ancient woodlands could also potentially have a minor negative impact, due to an increased risk of disturbance.
- D.4.4.3 The remaining reasonable alternative sites are not in close proximity to any areas of ancient woodland, and therefore a negligible impact could be expected.

D.4.5 Local Nature Reserves

- D.4.5.1 Bathpool Park, Bradwell Woods, Bateswood and Pool Dam Marshes are Local Nature Reserves or LNRs that lie within the boundary of Newcastle-under-Lyme Borough. Other nearby LNRs are Westport Lake, Hartshill Park, Ferndown, Cranberry Moss, Smith's Pool and Whitfield Valley. Sites TK45 and TK47 partially coincide with Bathpool Park LNR and therefore development at these locations could lead to a direct major negative impact on these LNRs. Sites BL18, HD26, KS19, TB23, TK17 lie within approximately 200m of LNRs and are therefore could potentially have a minor negative impact on the LNRs due to increased development related threats and pressures. Besides these, site HM8 and HM10 which are 270m and 330m away from 'Bateswood' LNR, which are likely to have a minor negative impact owing to the scale of the proposed development.
- D.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.

D.4.6 Sites of Biological Importance and Biodiversity Alert Sites

- D.4.6.1 Based on their diversity when scored against the Selection Criteria for Local Wildlife Site (LWS) Selection in Staffordshire, the LWS sites are further categorised into Sites of Biological Importance (SBI) and Biodiversity Alert Sites (BAS).
- D.4.6.2 Site boundaries of AB37, KL13, KL14, MD12, SP11, SP14 and TB19 coincide with BAS and site boundaries of LW54, LW82, MD11, MD56, LW6, BL18, TK25, TK47 and TB19 coincide with SBIs that are located in Newcastle-under-Lyme Borough. As a result, the anticipated development on these sites indicates potential direct and significant adverse impact on the

LWS. Besides these, 53 sites lie adjacent or in close proximity to either SBI or BAS, and therefore are likely to have either minor negative or indirect impact on these LWS.

- D.4.6.3 Development proposals at sites which are not located in proximity to any of the SBIs and BAS within the borough boundary would be expected to have negligible impact on the receptor.

D.4.7 Priority Habitats

- D.4.7.1 Newcastle-Under-Lyme Borough is home to a mixture of rural, urban, and sub-urban settings and as a result, demonstrated a wide range of priority habitats. Most of these constitutes 'deciduous woodland' and 'coastal and floodplain grazing marsh'.

- D.4.7.2 27 sites, most of which are located in 'Keele', 'Madeley & Betley', 'Talke & Butt Lane' clusters and 'Gypsy and Traveller' Site 2 and Site 6 coincide with areas of priority habitats. The proposed development at these 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. The sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

D.4.8 Regionally Important Geological Sites

- D.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. Job's Wood Quarry RIGS lies wholly within site SP12. Also, site AB34 is adjacent to Kent Hill Quarry RIGS and site KL20 is adjacent to Quarry Bank Quarry RIGS. As a result, the proposed development at these sites would be expected to have a minor negative impact on local geology.

D.4.9 Habitat Distinctiveness

- D.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.
- D.4.9.2 Based on the spatial data for habitat distinctiveness provided by the council, the proposed development on 18 of the sites could potentially have a positive impact as they are located outside the study area. 45 sites coincide with regions of 'Low' and/or 'Very Low' distinctiveness and the proposed development is anticipated to have negligible impact.
- D.4.9.3 21 sites could have major negative impact as they have been found to coincide with regions of 'high' and/or 'very high' distinctiveness, whereas the rest of the 57 sites could have minor negative impact as they coincide with regions of 'medium' distinctiveness.

Table D.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, Flora and Fauna

Site Ref	Proposed Site Use	Habitats Site	SSSI IRZ	NNR	Ancient Woodland	LNR	SBI/ BAS	Priority Habitat	RIGS	Distinctiveness
AB2	Employment	+/-	0	0	-	0	-	-	0	-
AB4	Mixed use	+/-	0	0	-	0	-	0	0	0
AB12	Housing	+/-	0	0	0	0	-	0	0	0
AB15	Housing	+/-	0	0	0	0	0	0	0	0
AB16	Housing	+/-	0	0	-	0	0	0	0	-
AB22	Housing	+/-	0	0	-	0	0	0	0	0
AB27	Housing	+/-	0	0	-	0	0	0	0	-
AB30	Mixed use (housing, education and sports)	+/-	0	0	-	0	-	0	0	0
AB32	Housing	+/-	0	0	0	0	0	0	0	-
AB33	Housing	+/-	0	0	0	0	0	0	0	0
AB34	Housing	+/-	0	0	-	0	0	0	-	-
AB37	Housing	+/-	0	0	0	0	--	0	0	--
AB72	Housing	+/-	0	0	-	0	0	0	0	-
AB73	Housing	+/-	0	0	0	0	0	0	0	-
AB75	Mixed use	+/-	0	0	0	0	-	0	0	0
AB77	Mixed use	+/-	0	0	-	0	0	0	0	-
AB78	Housing	+/-	0	0	0	0	0	0	0	0
AB79	Housing	+/-	0	0	-	0	0	0	0	0
HD26	Housing	+/-	0	0	0	-	-	0	0	+
HM8	Housing	+/-	0	0	-	-	-	0	0	-
HM10	Housing	+/-	0	0	-	-	-	0	0	0
HM15	Housing	+/-	0	0	0	0	0	0	0	--
HM22	Housing	+/-	0	0	0	0	0	0	0	-
HM66	Housing	+/-	0	0	0	0	0	0	0	-
CL6	Housing	+/-	0	0	-	0	0	0	0	+
CL8	Housing	+/-	0	0	-	0	-	0	0	-
SB12	Housing	+/-	0	0	-	0	-	0	0	-
CT1	Housing	+/-	0	0	-	0	-	-	0	0
CT10	Employment or Housing	+/-	0	0	-	0	-	0	0	--
CT20	Employment	+/-	0	0	-	0	-	0	0	--
CT25	Housing	+/-	0	0	-	0	0	-	0	-
CH3	Housing	+/-	0	0	-	0	0	0	0	0
CH13	Housing	+/-	0	0	-	0	0	0	0	0
CH14	Housing	+/-	0	0	-	0	0	0	0	0
KS3	Housing	+/-	0	0	-	0	-	0	0	0
KS11	Housing	+/-	0	0	-	0	0	0	0	+
KS17	Housing	+/-	0	0	-	0	0	0	0	0
KS18	Housing	+/-	0	0	-	0	0	0	0	+
KS19	Housing	+/-	0	0	-	-	0	0	0	+
KL9	Housing	+/-	0	0	-	0	-	0	0	-
KL12	Housing	+/-	0	0	-	0	0	-	0	--
KL13	Mixed use	+/-	0	0	-	0	--	-	0	--

Site Ref	Proposed Site Use	Habitats Site	SSSI IRZ	NNR	Ancient Woodland	LNR	SBI/ BAS	Priority Habitat	RIGS	Distinctiveness
KL14	Mixed use	+/-	0	0	-	0	--	-	0	-
KL15	Mixed use	+/-	0	0	-	0	-	-	0	0
KL20	Housing	+/-	0	0	-	0	-	0	-	-
KL21	Mixed use	+/-	0	0	-	0	-	0	0	0
KL33	Housing	+/-	0	0	-	0	0	0	0	0
KL34	Housing	+/-	0	0	-	0	-	0	0	-
KG6	Housing	+/-	0	0	-	0	0	0	0	+
KG26	Housing	+/-	0	0	-	0	0	0	0	0
RC4	Housing	+/-	0	0	0	0	0	0	0	0
RC8	Housing	+/-	0	0	-	0	0	-	0	--
LW14	Housing	+/-	0	0	-	0	-	0	0	-
LW23	Housing	+/-	0	0	-	0	-	0	0	0
LW27	Housing	+/-	0	0	0	0	0	0	0	0
LW29	Housing	+/-	0	0	-	0	-	0	0	-
LW30	Housing	+/-	0	0	-	0	-	0	0	-
LW41	Housing	+/-	0	0	-	0	-	0	0	-
LW49	Housing	+/-	0	0	-	0	-	0	0	+
LW53	Housing	+/-	-	0	-	0	-	0	0	0
LW54	Housing	+/-	-	0	-	0	--	-	0	-
LW81	Housing	+/-	0	0	0	0	0	0	0	-
LW82	Housing	+/-	0	0	-	0	--	0	0	+
LW87	Housing	+/-	0	0	-	0	-	0	0	+
HM4	Housing	+/-	-	0	-	0	0	-	0	-
HM28	Housing	+/-	-	0	-	0	0	0	0	+
HM29	Housing	+/-	-	0	-	0	0	0	0	+
MD2	Housing	+/-	0	0	-	0	-	0	0	+
MD5	Housing	+/-	0	0	-	0	-	-	0	0
MD11	Mixed use	+/-	0	0	-	0	--	-	0	0
MD12	Mixed use	+/-	0	0	-	0	--	-	0	-
MD13	Housing	+/-	0	0	-	0	-	0	0	-
MD18	Housing	+/-	0	0	-	0	-	0	0	-
MD19	Housing	+/-	0	0	0	0	-	0	0	-
MD20	Mixed use (housing, education and sports)	+/-	0	0	-	0	-	0	0	-
MD25	Housing	+/-	0	0	-	0	-	0	0	-
MD29	Housing	+/-	0	0	-	0	-	0	0	0
MD30	Housing	+/-	0	0	-	0	-	0	0	0
MD32	Housing	+/-	0	0	-	0	-	0	0	-
MD33	Housing	+/-	0	0	-	0	-	0	0	0
MD34	Housing	+/-	0	0	-	0	-	0	0	0
MD39	Housing	+/-	0	0	-	0	-	0	0	-
MD40	Housing	+/-	0	0	-	0	-	0	0	-
MD56	Housing	+/-	0	0	-	0	--	0	0	--
LW6	Mixed use	+/-	0	0	0	0	--	-	0	-
LW7	Housing	+/-	0	0	-	0	-	0	0	-

Site Ref	Proposed Site Use	Habitats Site	SSSI IRZ	NNR	Ancient Woodland	LNR	SBI/ BAS	Priority Habitat	RIGS	Distinctiveness
LW9	Housing	+/-	0	0	0	0	0	0	0	+
LW38	Housing	+/-	0	0	0	0	0	0	0	-
LW42	Housing	+/-	0	0	0	0	0	0	0	0
LW48	Housing	+/-	0	0	0	0	-	-	0	-
LW74	Housing	+/-	0	0	-	0	0	0	0	0
LW78	Housing	+/-	0	0	0	0	0	0	0	-
LW83	Housing	+/-	0	0	0	0	0	0	0	+
LW84	Housing	+/-	0	0	0	0	0	0	0	0
LW86	Mixed use	+/-	-	0	0	0	0	0	0	0
NC13	Housing	+/-	0	0	0	0	0	0	0	-
NC77	Mixed use	+/-	0	0	0	0	0	0	0	-
NC78	Housing	+/-	0	0	0	0	0	0	0	-
NC80	Housing	+/-	-	0	-	0	0	0	0	-
NC81	Housing	+/-	0	0	0	0	0	0	0	-
NC83	Housing	+/-	0	0	0	0	0	0	0	-
SP2	Housing	+/-	0	0	0	0	0	0	0	0
SP11	Housing	+/-	0	0	-	0	--	-	-	--
SP12	Housing	+/-	0	0	0	0	0	0	0	-
SP14	Housing	+/-	0	0	-	0	--	0	0	--
SP22	Housing	+/-	0	0	0	0	0	0	0	0
SP23	Housing	+/-	0	0	-	0	-	0	0	-
BL3	Housing	+/-	0	0	-	0	0	-	0	--
BL8	Mixed use	+/-	0	0	-	0	-	-	0	0
BL18	Housing	+/-	0	0	-	-	--	-	0	-
BL24	Housing	+/-	0	0	0	0	0	0	0	+
BL32	Mixed use	+/-	0	0	0	0	0	0	0	-
TK6	Housing	+/-	0	0	0	0	0	0	0	0
TK10	Housing	+/-	0	0	-	0	-	0	0	-
TK17	Housing	+/-	0	0	-	-	-	0	0	-
TK18	Mixed use	+/-	0	0	-	0	-	0	0	--
TK24	Housing	+/-	0	0	0	0	0	0	0	-
TK25	Mixed use	+/-	0	0	-	0	--	-	0	0
TK27	Housing	+/-	0	0	0	0	--	0	0	-
TK30	Mixed use	+/-	0	0	-	0	-	-	0	--
TK45	Employment	+/-	0	0	-	--	-	0	0	-
TK46	Housing	+/-	0	0	-	0	-	-	0	--
TK47	Employment	+/-	0	0	-	--	0	-	0	--
TB6	Housing	+/-	0	0	0	0	0	0	0	+
TB19	Mixed use	+/-	0	0	-	0	--	-	0	-
TB23	Housing	+/-	0	0	-	-	0	0	0	-
TB24	Housing	+/-	0	0	-	0	-	0	0	--
MB12	Housing	+/-	0	0	0	0	0	0	0	+
MB13	Housing	+/-	0	0	0	0	0	-	0	0
MB15	Housing	+/-	0	0	0	0	0	0	0	+

Site Ref	Proposed Site Use	Habitats Site	SSSI IRZ	NNR	Ancient Woodland	LNR	SBI/ BAS	Priority Habitat	RIGS	Distinctiveness
TC7	Mixed use	+/-	0	0	0	0	0	0	0	0
TC22	Mixed use	+/-	0	0	0	0	0	0	0	0
TC40	Housing	+/-	0	0	0	0	0	0	0	0
TC45	Employment	+/-	0	0	0	0	-	0	0	0
Site 1	Gypsy and Traveller	+/-	0	0	0	0	0	0	0	--
Site 2	Gypsy and Traveller	+/-	0	0	0	0	0	-	0	--
Site 3	Gypsy and Traveller	+/-	0	0	0	0	0	0	0	-
Site 4	Gypsy and Traveller	+/-	0	0	0	0	0	0	0	--
Site 5	Gypsy and Traveller	+/-	0	0	0	0	0	0	0	-
Site 6	Gypsy and Traveller	+/-	0	0	0	0	0	-	0	--
Site 7	Gypsy and Traveller	+/-	0	0	0	0	0	0	0	0

D.5 SA Objective 4: Natural Resources and Waste

D.5.1 Efficient Use of Land and Soil Resources

- D.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.
- D.5.1.2 15 of the reasonable alternative sites for development in Newcastle-Under-Lyme wholly comprise previously developed land. Development proposed at these sites would therefore be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.
- D.5.1.3 The majority of the reasonable alternative sites for development in the borough wholly or partially comprise undeveloped land. Boundaries of 65 sites coincide with moderate to very good quality land (ALC Grade 2 and 3). Out of these, sites AB2, AB16, AB77, KL13, KL14, KL21, MD20, TK47 and TB19 could potentially have a major adverse impact on the soil resources owing to their size (more than 20ha) and associated loss of potential BMV agricultural land, whereas the rest of the sites would have a minor negative impact due to the loss of less than 20ha of potential BMV land.
- D.5.1.4 The remaining 46 sites which are wholly or partially undeveloped would have a minor positive impact on conserving Newcastle-under-Lyme Borough's BMV land and natural resources as they are within the regions of urban and non-agricultural land (Grade 4 & 5).
- D.5.1.5 11 sites coincide with historic landfill sites, representing potential contaminated land. Development at these locations could lead to positive effects on natural resources and the efficient use of land assuming that the land would be remediated prior to development.

D.5.2 Mineral Safeguarding Areas

- D.5.2.1 Newcastle-under-Lyme contains several Mineral Safeguarding Areas (MSA) and these are primarily 'Bedrock Sand', 'Brick Clay', 'Coal Fire Clay', and 'Superficial Sand and Gravel'.
- D.5.2.2 122 of the reasonable alternative sites coincide with MSAs and therefore 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 would be expected to have a minor negative impact on the natural resources of the surrounding area.
- D.5.2.3 At this stage of site assessments, none of the site proposals indicate the potential for minerals extraction. The remaining sites which do not coincide with any MSAs would have negligible impact on the natural resources.

D.5.3 Household Waste

- D.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. 57 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. 81 of the reasonable alternative sites for development are 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.
- D.5.3.2 Sites LW53, LW54 and LW82 are located beyond a 20-minute drive if located in an urban area and beyond a 30-minute drive if located in a rural area of household waste recycling centres. These three sites can therefore expect to have a minor negative impact on waste management in the local area.

Table D.5.1: Sites impact matrix for SA Objective 4 – Natural Resources and Waste

Site Ref	Proposed Site Use	Land & Soil	MSA	Waste
AB2	Employment	--	-	+
AB4	Mixed use	-	-	+
AB12	Housing	-	-	+
AB15	Housing	-	-	+
AB16	Housing	--	-	+
AB22	Housing	-	-	+
AB27	Housing	-	-	+
AB30	Mixed use (housing, education and sports)	-	-	+
AB32	Housing	-	-	+
AB33	Housing	-	-	+
AB34	Housing	-	-	+
AB37	Housing	-	-	+
AB72	Housing	-	-	+
AB73	Housing	+	-	+
AB75	Mixed use	-	-	+
AB77	Mixed use	--	-	+
AB78	Housing	-	-	+
AB79	Housing	-	-	+
HD26	Housing	+	-	+
HM8	Housing	-	-	+
HM10	Housing	+	-	+
HM15	Housing	+	-	++
HM22	Housing	+	-	++
HM66	Housing	-	-	+
CL6	Housing	+	0	++
CL8	Housing	-	-	++
SB12	Housing	+	-	++
CT1	Housing	+	-	++
CT10	Employment or Housing	+	-	+
CT20	Employment	+	-	+
CT25	Housing	+	-	+

Site Ref	Proposed Site Use	Land & Soil	MSA	Waste
CH3	Housing	+	0	++
CH13	Housing	+	-	+
CH14	Housing	+	0	+
KS3	Housing	+	-	+
KS11	Housing	+	-	+
KS17	Housing	+	-	+
KS18	Housing	+	-	+
KS19	Housing	+	-	+
KL9	Housing	-	-	++
KL12	Housing	-	0	++
KL13	Mixed use	--	0	++
KL14	Mixed use	--	-	+
KL15	Mixed use	-	-	+
KL20	Housing	-	-	++
KL21	Mixed use	--	-	++
KL33	Housing	-	0	++
KL34	Housing	-	0	++
KG6	Housing	+	-	+
KG26	Housing	+	-	+
RC4	Housing	+	-	++
RC8	Housing	+	-	+
LW14	Housing	-	-	+
LW23	Housing	+	-	+
LW27	Housing	-	0	+
LW29	Housing	-	0	+
LW30	Housing	-	0	+
LW41	Housing	-	0	+
LW49	Housing	+	-	+
LW53	Housing	-	-	-
LW54	Housing	+	-	-
LW81	Housing	-	-	+
LW82	Housing	+	-	-
LW87	Housing	+	-	+
HM4	Housing	-	-	++
HM28	Housing	+	-	+
HM29	Housing	-	-	++
MD2	Housing	-	-	++
MD5	Housing	-	-	++
MD11	Mixed use	-	-	++
MD12	Mixed use	-	-	++
MD13	Housing	-	-	++
MD18	Housing	-	-	++
MD19	Housing	-	-	++
MD20	Mixed use (housing, education and sports)	--	-	++
MD25	Housing	-	-	++
MD29	Housing	-	-	++
MD30	Housing	-	-	++
MD32	Housing	-	-	++
MD33	Housing	-	-	++

Site Ref	Proposed Site Use	Land & Soil	MSA	Waste
MD34	Housing	-	-	++
MD39	Housing	-	-	++
MD40	Housing	-	-	++
MD56	Housing	-	-	++
LW6	Mixed use	-	-	+
LW7	Housing	-	-	++
LW9	Housing	-	0	+
LW38	Housing	-	-	+
LW42	Housing	-	-	+
LW48	Housing	-	-	+
LW74	Housing	-	-	+
LW78	Housing	-	0	+
LW83	Housing	-	-	+
LW84	Housing	-	0	+
LW86	Mixed use	-	0	+
NC13	Housing	+	-	++
NC77	Mixed use	+	-	++
NC78	Housing	+	-	++
NC80	Housing	+	-	++
NC81	Housing	+	-	++
NC83	Housing	+	-	++
SP2	Housing	+	-	++
SP11	Housing	-	-	++
SP12	Housing	-	-	++
SP14	Housing	-	-	++
SP22	Housing	+	-	++
SP23	Housing	-	-	++
BL3	Housing	+	-	+
BL8	Mixed use	+	-	+
BL18	Housing	+	-	+
BL24	Housing	+	-	+
BL32	Mixed use	+	-	+
TK6	Housing	+	-	+
TK10	Housing	-	-	+
TK17	Housing	+	-	+
TK18	Mixed use	+	-	+
TK24	Housing	-	-	+
TK25	Mixed use	-	-	+
TK27	Housing	-	-	+
TK30	Mixed use	+	-	+
TK45	Employment	+	-	++
TK46	Housing	+	-	+
TK47	Employment	--	-	++
TB6	Housing	-	-	+
TB19	Mixed use	--	-	+
TB23	Housing	-	-	+
TB24	Housing	+	-	++
MB12	Housing	+	-	++
MB13	Housing	+	0	+

Site Ref	Proposed Site Use	Land & Soil	MSA	Waste
MB15	Housing	+	0	+
TC7	Mixed use	+	-	++
TC22	Mixed use	+	-	++
TC40	Housing	+	-	++
TC45	Employment	+	-	++
Site 1	Gypsy and Traveller	+	-	+
Site 2	Gypsy and Traveller	+	-	+
Site 3	Gypsy and Traveller	+	-	+
Site 4	Gypsy and Traveller	+	-	+
Site 5	Gypsy and Traveller	-	0	++
Site 6	Gypsy and Traveller	-	0	+
Site 7	Gypsy and Traveller	+	-	++

D.6 SA Objective 5: Flooding

D.6.1 Flood Zones

- D.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.
- D.6.1.2 More than 10% of the sites AB37, CH13 and MD20 are located within Flood Zones 2, 3a and/or 3b. The proposed development at these sites could potentially have a major negative impact on flooding in the area. For sites AB2, AB77, MD12 and TB23, less than 10% of their area coincides with Flood Zones 2, 3a and 3b. Therefore, the proposed development at these sites could potentially have a minor negative impact on flooding in the area.
- D.6.1.3 The remaining 134 sites which are located wholly within Flood Zone 1 would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

D.6.2 Surface Water Flood Risk

- D.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.
- D.6.2.2 43 of the reasonable alternative sites for development are located in 50% or more of low risk and/or over 10% in medium risk and/or 1% in high risk of surface water flooding and therefore would be expected to have a major negative impact on surface water flooding. 44 of the reasonable alternative sites for development are located in 1-50% of low and/or 1-10% of medium risk of surface water flooding and therefore would be expected to have a minor negative impact on surface water flooding. Development at these locations would be likely to locate site end users in areas risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.
- D.6.2.3 The remaining 54 sites which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

Table D.6.1: Sites impact matrix for SA Objective 5 – Flooding

Site Ref	Proposed Site Use	Fluvial Flooding	SWFR
AB2	Employment	-	--
AB4	Mixed use	+	0
AB12	Housing	+	-
AB15	Housing	+	-
AB16	Housing	+	--
AB22	Housing	+	--
AB27	Housing	+	0
AB30	Mixed use (housing, education and sports)	+	-

Site Ref	Proposed Site Use	Fluvial Flooding	SWFR
AB32	Housing	+	-
AB33	Housing	+	--
AB34	Housing	+	0
AB37	Housing	--	--
AB72	Housing	+	0
AB73	Housing	+	0
AB75	Mixed use	+	--
AB77	Mixed use	-	-
AB78	Housing	+	-
AB79	Housing	+	--
HD26	Housing	+	-
HM8	Housing	+	-
HM10	Housing	+	-
HM15	Housing	+	0
HM22	Housing	+	0
HM66	Housing	+	--
CL6	Housing	+	-
CL8	Housing	+	-
SB12	Housing	+	0
CT1	Housing	+	-
CT10	Employment or Housing	+	-
CT20	Employment	+	-
CT25	Housing	+	0
CH3	Housing	+	-
CH13	Housing	--	-
CH14	Housing	+	-
KS3	Housing	+	--
KS11	Housing	+	0
KS17	Housing	+	-
KS18	Housing	+	0
KS19	Housing	+	0
KL9	Housing	+	-
KL12	Housing	+	0
KL13	Mixed use	+	--
KL14	Mixed use	+	-
KL15	Mixed use	+	-
KL20	Housing	+	0
KL21	Mixed use	+	-
KL33	Housing	+	0
KL34	Housing	+	-
KG6	Housing	+	--
KG26	Housing	+	0
RC4	Housing	+	--
RC8	Housing	+	--
LW14	Housing	+	0
LW23	Housing	+	0
LW27	Housing	+	0
LW29	Housing	+	0
LW30	Housing	+	0

Site Ref	Proposed Site Use	Fluvial Flooding	SWFR
LW41	Housing	+	-
LW49	Housing	+	0
LW53	Housing	+	0
LW54	Housing	+	--
LW81	Housing	+	0
LW82	Housing	+	--
LW87	Housing	+	0
HM4	Housing	+	-
HM28	Housing	+	0
HM29	Housing	+	0
MD2	Housing	+	0
MD5	Housing	+	--
MD11	Mixed use	+	--
MD12	Mixed use	-	--
MD13	Housing	+	--
MD18	Housing	+	--
MD19	Housing	+	-
MD20	Mixed use (housing, education and sports)	--	--
MD25	Housing	+	--
MD29	Housing	+	--
MD30	Housing	+	-
MD32	Housing	+	--
MD33	Housing	+	-
MD34	Housing	+	0
MD39	Housing	+	0
MD40	Housing	+	0
MD56	Housing	+	-
LW6	Mixed use	+	-
LW7	Housing	+	0
LW9	Housing	+	0
LW38	Housing	+	0
LW42	Housing	+	0
LW48	Housing	+	0
LW74	Housing	+	0
LW78	Housing	+	0
LW83	Housing	+	-
LW84	Housing	+	0
LW86	Mixed use	+	0
NC13	Housing	+	--
NC77	Mixed use	+	--
NC78	Housing	+	--
NC80	Housing	+	-
NC81	Housing	+	-
NC83	Housing	+	--
SP2	Housing	+	0
SP11	Housing	+	-
SP12	Housing	+	0
SP14	Housing	+	-
SP22	Housing	+	--

Site Ref	Proposed Site Use	Fluvial Flooding	SWFR
SP23	Housing	+	0
BL3	Housing	+	--
BL8	Mixed use	+	--
BL18	Housing	+	--
BL24	Housing	+	--
BL32	Mixed use	+	--
TK6	Housing	+	--
TK10	Housing	+	0
TK17	Housing	+	-
TK18	Mixed use	+	--
TK24	Housing	+	--
TK25	Mixed use	+	-
TK27	Housing	+	-
TK30	Mixed use	+	--
TK45	Employment	+	-
TK46	Housing	+	--
TK47	Employment	+	-
TB6	Housing	+	0
TB19	Mixed use	+	--
TB23	Housing	-	--
TB24	Housing	+	0
MB12	Housing	+	0
MB13	Housing	+	0
MB15	Housing	+	0
TC7	Mixed use	+	-
TC22	Mixed use	+	0
TC40	Housing	+	0
TC45	Employment	+	-
Site 1	Gypsy and Traveller	+	0
Site 2	Gypsy and Traveller	+	-
Site 3	Gypsy and Traveller	+	--
Site 4	Gypsy and Traveller	+	-
Site 5	Gypsy and Traveller	+	0
Site 6	Gypsy and Traveller	+	--
Site 7	Gypsy and Traveller	+	0

D.7 SA Objective 6: Water

D.7.1 Water Quality

D.7.1.1 Newcastle-Under-Lyme's watercourse network largely comprises of 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. Nine of the reasonable alternative sites for development coincide with or are located within 10m of various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

D.7.1.2 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. At this stage, the potential effects of all other sites on water quality are uncertain and would depend upon implementation.

D.7.2 Groundwater SPZ

D.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. 21 of the reasonable alternative sites for development are located wholly or partially within the total catchment of SPZ 2 or 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 sites do not coincide with the catchment of any SPZ.

Table D.7.1: Sites impact matrix for SA Objective 6 – Water

Site Ref	Proposed Site Use	Water Quality	SPZ
AB2	Employment	+/-	-
AB4	Mixed use	+/-	-
AB12	Housing	+/-	0
AB15	Housing	+/-	0
AB16	Housing	+/-	0
AB22	Housing	+/-	0
AB27	Housing	+/-	0
AB30	Mixed use (housing, education and sports)	+/-	0
AB32	Housing	+/-	0
AB33	Housing	+/-	0
AB34	Housing	+/-	-
AB37	Housing	-	-
AB72	Housing	+/-	0
AB73	Housing	+/-	0
AB75	Mixed use	+/-	0
AB77	Mixed use	-	-
AB78	Housing	+/-	-
AB79	Housing	+/-	-
HD26	Housing	+/-	0

Site Ref	Proposed Site Use	Water Quality	SPZ
HM8	Housing	+/-	0
HM10	Housing	+/-	0
HM15	Housing	+/-	0
HM22	Housing	+/-	0
HM66	Housing	+/-	0
CL6	Housing	+/-	0
CL8	Housing	+/-	0
SB12	Housing	+/-	0
CT1	Housing	+/-	0
CT10	Employment or Housing	+/-	0
CT20	Employment	+/-	0
CT25	Housing	+/-	0
CH3	Housing	+/-	0
CH13	Housing	+/-	0
CH14	Housing	+/-	0
KS3	Housing	+/-	0
KS11	Housing	+/-	0
KS17	Housing	+/-	0
KS18	Housing	+/-	0
KS19	Housing	+/-	0
KL9	Housing	+/-	0
KL12	Housing	+/-	0
KL13	Mixed use	+/-	0
KL14	Mixed use	+/-	0
KL15	Mixed use	+/-	0
KL20	Housing	+/-	0
KL21	Mixed use	+/-	0
KL33	Housing	+/-	0
KL34	Housing	+/-	0
KG6	Housing	+/-	0
KG26	Housing	+/-	0
RC4	Housing	+/-	0
RC8	Housing	+/-	0
LW14	Housing	+/-	0
LW23	Housing	+/-	0
LW27	Housing	+/-	-
LW29	Housing	+/-	-
LW30	Housing	+/-	-
LW41	Housing	+/-	0
LW49	Housing	+/-	0
LW53	Housing	+/-	-
LW54	Housing	-	-
LW81	Housing	+/-	-
LW82	Housing	-	0
LW87	Housing	+/-	0
HM4	Housing	+/-	0
HM28	Housing	+/-	0
HM29	Housing	+/-	0
MD2	Housing	+/-	0

Site Ref	Proposed Site Use	Water Quality	SPZ
MD5	Housing	+/-	0
MD11	Mixed use	+/-	0
MD12	Mixed use	+/-	0
MD13	Housing	+/-	0
MD18	Housing	+/-	0
MD19	Housing	+/-	0
MD20	Mixed use (housing, education and sports)	+/-	0
MD25	Housing	+/-	0
MD29	Housing	+/-	0
MD30	Housing	+/-	0
MD32	Housing	+/-	0
MD33	Housing	+/-	0
MD34	Housing	+/-	0
MD39	Housing	+/-	0
MD40	Housing	-	0
MD56	Housing	+/-	0
LW6	Mixed use	+/-	-
LW7	Housing	+/-	0
LW9	Housing	+/-	-
LW38	Housing	+/-	-
LW42	Housing	+/-	0
LW48	Housing	+/-	-
LW74	Housing	+/-	-
LW78	Housing	+/-	-
LW83	Housing	+/-	0
LW84	Housing	+/-	-
LW86	Mixed use	+/-	-
NC13	Housing	+/-	0
NC77	Mixed use	+/-	0
NC78	Housing	+/-	0
NC80	Housing	+/-	0
NC81	Housing	+/-	0
NC83	Housing	+/-	0
SP2	Housing	+/-	0
SP11	Housing	+/-	0
SP12	Housing	+/-	0
SP14	Housing	+/-	0
SP22	Housing	+/-	0
SP23	Housing	+/-	0
BL3	Housing	+/-	0
BL8	Mixed use	+/-	0
BL18	Housing	+/-	0
BL24	Housing	+/-	0
BL32	Mixed use	+/-	0
TK6	Housing	+/-	0
TK10	Housing	+/-	0
TK17	Housing	+/-	0
TK18	Mixed use	-	0
TK24	Housing	+/-	0

Site Ref	Proposed Site Use	Water Quality	SPZ
TK25	Mixed use	+/-	0
TK27	Housing	+/-	0
TK30	Mixed use	+/-	0
TK45	Employment	+/-	0
TK46	Housing	-	0
TK47	Employment	+/-	0
TB6	Housing	+/-	0
TB19	Mixed use	+/-	0
TB23	Housing	+/-	0
TB24	Housing	+/-	0
MB12	Housing	+/-	0
MB13	Housing	+/-	0
MB15	Housing	+/-	0
TC7	Mixed use	+/-	0
TC22	Mixed use	+/-	0
TC40	Housing	-	0
TC45	Employment	+/-	0
Site 1	Gypsy and Traveller	-	0
Site 2	Gypsy and Traveller	+/-	0
Site 3	Gypsy and Traveller	+/-	0
Site 4	Gypsy and Traveller	+/-	0
Site 5	Gypsy and Traveller	+/-	0
Site 6	Gypsy and Traveller	+/-	0
Site 7	Gypsy and Traveller	+/-	0

D.8 SA Objective 7: Cultural Heritage

D.8.1 Grade I Listed Buildings

- D.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 reasonable alternative sites in Newcastle-Under-Lyme would be unlikely to significantly impact any of the Grade I Listed Buildings.

D.8.2 Grade II* Listed Buildings

- D.8.2.1 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. No sites coincide or are adjacent to any Grade II* Listed Buildings, however, six of the reasonable alternative sites have potential to adversely affect the setting of a Grade II* Listed Building.
- D.8.2.2 Sites HM29 and HM4 are located in close proximity to 'Summer House'. HM29 is located approximately 30m from 'Summer House' and HM4 is located 80m from 'Summer House'. Sites KL21 and KL33 are located in close proximity to 'Church of St John the Baptist'. KL21 is located 130m from 'Church of St John the Baptist' and KL33 is located 60m from 'Church of St John the Baptist'. Site AB16 is located 200m from the 'Church of St James'. Site MD20 is located 90m from 'The Old Hall'. The proposed development at these six sites could potentially result in a minor negative impact on the setting of these Grade II* Listed Buildings.

D.8.3 Grade II Listed Buildings

- D.8.3.1 338 Grade II Listed Buildings can be found in Newcastle-Under-Lyme, with large clusters found within urban areas. 26 of the reasonable alternative sites are located in close proximity to a Grade II Listed Building and could potentially lead to a minor negative impact on their settings. Site TK10 notably is likely to have a minor negative impact on six Grade II Listed Buildings. Eight of the reasonable alternative sites are located adjacent to a Grade II Listed Building and therefore would be likely to have a minor negative impact on their settings.
- D.8.3.2 Site BL3 coincides with 'Wood Shutt Farmhouse' a Grade II Listed Building. Development at this proposed site could potentially lead to a direct major negative impact on the Grade II Listed Building. Site BL3 is also located in close proximity to 'Trent and Mersey canal bridge over Macclesfield canal'.

D.8.4 Conservation Area

- D.8.4.1 There are 21 Conservation Areas (CAs) located within Newcastle-Under-Lyme, the majority of which reside in the south and east of the borough. Site TC45 is located wholly within Newcastle Town Centre CA and could potentially have a minor negative impact on the character of the CA. A further 37 sites proposed for development are located adjacent or in close proximity to a CA and therefore the proposed development at these sites could

potentially result in a minor negative impact on the setting of CAs in Newcastle-Under-Lyme.

D.8.5 Scheduled Monument

D.8.5.1 There are 13 Scheduled Monuments (SMs) located in Newcastle-Under-Lyme, all SMs cover small historical features. Site AB16 is located approximately 160m from 'Castle Hill motte' SM and AB37 located 90m from this SM. Site CT25 is located 180m from 'Springwood blast furnace' SM. The proposed development at these three sites could potentially have a minor negative impact on the setting of these SMs.

D.8.6 Registered Park and Garden

D.8.6.1 Two Registered Parks and Gardens (RPGs) can be found within Newcastle-Under-Lyme, Maer Hall and Keele Hall. 14 sites are located in close proximity to an RPG, and site TB19 is located adjacent to Keele Hall. The development proposed at these 15 sites could potentially impact the views of or from the RPG and therefore have a minor negative impact on the setting of the RPGs.

D.8.6.2 Sites KL13 and KL14 coincide with Keele Hall RPG. 10.8% of site KL13, and 79% of KL14 coincide with Keele Hall RPG. The development proposed at these two sites could potentially lead to direct major negative impacts on the character of the RPG.

Table D.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
AB4	Mixed use	0	0	0	0	0	0
AB12	Housing	0	0	0	0	0	0
AB15	Housing	0	0	0	0	0	0
AB16	Housing	0	-	0	-	-	0
AB22	Housing	0	0	0	0	0	0
AB27	Housing	0	0	0	0	0	0
AB30	Mixed use (housing, education and sports)	0	0	0	0	0	0
AB32	Housing	0	0	0	-	0	0
AB33	Housing	0	0	0	-	0	0
AB34	Housing	0	0	0	0	0	0
AB37	Housing	0	0	-	-	-	0
AB72	Housing	0	0	0	0	0	0
AB73	Housing	0	0	0	0	0	0
AB75	Mixed use	0	0	0	0	0	0
AB77	Mixed use	0	0	-	0	0	0
AB78	Housing	0	0	-	0	0	0
AB79	Housing	0	0	-	0	0	0
HD26	Housing	0	0	0	0	0	0
HM8	Housing	0	0	0	0	0	0
HM10	Housing	0	0	0	0	0	0
HM15	Housing	0	0	0	0	0	0
HM22	Housing	0	0	0	0	0	0

Site Ref	Proposed Site Use	Grade I LB	Grade II* LB	Grade II LB	CA	SM	RPG
HM66	Housing	0	0	0	0	0	0
CL6	Housing	0	0	0	0	0	0
CL8	Housing	0	0	-	-	0	0
SB12	Housing	0	0	0	-	0	0
CT1	Housing	0	0	0	0	0	0
CT10	Employment or Housing	0	0	0	0	0	0
CT20	Employment	0	0	0	0	0	0
CT25	Housing	0	0	-	0	-	0
CH3	Housing	0	0	0	0	0	0
CH13	Housing	0	0	0	0	0	0
CH14	Housing	0	0	0	0	0	0
KS3	Housing	0	0	0	0	0	0
KS11	Housing	0	0	0	0	0	0
KS17	Housing	0	0	0	0	0	0
KS18	Housing	0	0	0	0	0	0
KS19	Housing	0	0	0	0	0	0
KL9	Housing	0	0	0	-	0	0
KL12	Housing	0	0	-	0	0	-
KL13	Mixed use	0	0	0	-	0	--
KL14	Mixed use	0	0	0	-	0	--
KL15	Mixed use	0	0	0	0	0	-
KL20	Housing	0	0	0	0	0	0
KL21	Mixed use	0	-	-	-	0	-
KL33	Housing	0	-	-	-	0	-
KL34	Housing	0	0	-	-	0	-
KG6	Housing	0	0	0	0	0	0
KG26	Housing	0	0	0	0	0	0
RC4	Housing	0	0	0	-	0	0
RC8	Housing	0	0	0	0	0	0
LW14	Housing	0	0	0	0	0	0
LW23	Housing	0	0	0	0	0	0
LW27	Housing	0	0	0	0	0	0
LW29	Housing	0	0	0	0	0	0
LW30	Housing	0	0	0	0	0	0
LW41	Housing	0	0	0	0	0	0
LW49	Housing	0	0	0	0	0	0
LW53	Housing	0	0	0	0	0	0
LW54	Housing	0	0	-	0	0	0
LW81	Housing	0	0	-	0	0	0
LW82	Housing	0	0	0	0	0	0
LW87	Housing	0	0	0	0	0	0
HM4	Housing	0	-	-	0	0	0
HM28	Housing	0	0	-	-	0	0
HM29	Housing	0	-	0	0	0	0
MD2	Housing	0	0	0	0	0	0
MD5	Housing	0	0	0	0	0	0
MD11	Mixed use	0	0	0	0	0	0
MD12	Mixed use	0	0	-	0	0	0
MD13	Housing	0	0	0	-	0	0

Site Ref	Proposed Site Use	Grade I LB	Grade II* LB	Grade II LB	CA	SM	RPG
MD18	Housing	0	0	0	-	0	0
MD19	Housing	0	0	0	-	0	0
MD20	Mixed use (housing, education and sports)	0	-	0	-	0	0
MD25	Housing	0	0	-	-	0	0
MD29	Housing	0	0	-	-	0	0
MD30	Housing	0	0	0	0	0	0
MD32	Housing	0	0	0	0	0	0
MD33	Housing	0	0	-	-	0	0
MD34	Housing	0	0	0	0	0	0
MD39	Housing	0	0	-	-	0	0
MD40	Housing	0	0	0	0	0	0
MD56	Housing	0	0	-	0	0	0
LW6	Mixed use	0	0	0	0	0	0
LW7	Housing	0	0	-	-	0	0
LW9	Housing	0	0	0	-	0	-
LW38	Housing	0	0	0	0	0	-
LW42	Housing	0	0	0	0	0	0
LW48	Housing	0	0	0	0	0	0
LW74	Housing	0	0	0	0	0	-
LW78	Housing	0	0	0	0	0	-
LW83	Housing	0	0	0	0	0	0
LW84	Housing	0	0	0	-	0	-
LW86	Mixed use	0	0	0	-	0	-
NC13	Housing	0	0	0	0	0	0
NC77	Mixed use	0	0	-	0	0	0
NC78	Housing	0	0	-	0	0	0
NC80	Housing	0	0	-	0	0	0
NC81	Housing	0	0	0	0	0	0
NC83	Housing	0	0	0	0	0	0
SP2	Housing	0	0	0	0	0	0
SP11	Housing	0	0	-	0	0	-
SP12	Housing	0	0	0	0	0	0
SP14	Housing	0	0	0	0	0	-
SP22	Housing	0	0	0	-	0	0
SP23	Housing	0	0	0	0	0	-
BL3	Housing	0	0	--	-	0	0
BL8	Mixed use	0	0	0	0	0	0
BL18	Housing	0	0	0	0	0	0
BL24	Housing	0	0	0	0	0	0
BL32	Mixed use	0	0	0	0	0	0
TK6	Housing	0	0	0	0	0	0
TK10	Housing	0	0	-	-	0	0
TK17	Housing	0	0	-	0	0	0
TK18	Mixed use	0	0	0	0	0	0
TK24	Housing	0	0	0	-	0	0
TK25	Mixed use	0	0	0	-	0	0
TK27	Housing	0	0	0	-	0	0
TK30	Mixed use	0	0	-	0	0	0

Site Ref	Proposed Site Use	Grade I LB	Grade II* LB	Grade II LB	CA	SM	RPG
TK45	Employment	0	0	0	0	0	0
TK46	Housing	0	0	0	0	0	0
TK47	Employment	0	0	0	0	0	0
TB6	Housing	0	0	0	0	0	0
TB19	Mixed use	0	0	0	-	0	-
TB23	Housing	0	0	0	0	0	0
TB24	Housing	0	0	0	0	0	0
MB12	Housing	0	0	0	0	0	0
MB13	Housing	0	0	0	-	0	0
MB15	Housing	0	0	0	-	0	0
TC7	Mixed use	0	0	-	-	0	0
TC22	Mixed use	0	0	0	-	0	0
TC40	Housing	0	0	0	0	0	0
TC45	Employment	0	0	-	-	0	0
Site 1	Gypsy and Traveller	0	0	0	0	0	0
Site 2	Gypsy and Traveller	0	0	0	0	0	0
Site 3	Gypsy and Traveller	0	0	0	0	0	0
Site 4	Gypsy and Traveller	0	0	0	0	0	0
Site 5	Gypsy and Traveller	0	0	0	0	0	-
Site 6	Gypsy and Traveller	0	0	0	0	0	0
Site 7	Gypsy and Traveller	0	0	0	0	0	0

D.9 SA Objective 8: Landscape

D.9.1 Landscape Character

- D.9.1.1 71 of the reasonable alternative sites could potentially lead to loss or degradation of key landscape features or contradict with the guidelines of the Landscape Character Type (LCA) in question; therefore, would be expected to have a minor negative impact on the landscape character.
- D.9.1.2 Remaining sites were excluded from the assessment as they are located outside the Landscape and Settlement Character Assessment (LSCA) (2022)¹.

D.9.2 Landscape Sensitivity

- D.9.2.1 53 of the reasonable alternative sites are located within areas identified as being of 'medium' sensitivity in the LSCA and can therefore be expected to result in a minor impact on the landscape. 56 of the reasonable alternative sites are located within areas identified as being of 'high' sensitivity and can therefore be expected to result in a major negative impact on the landscape.
- D.9.2.2 Remaining sites were excluded from the assessment as they are located outside the LSCA (2022)².

D.9.3 Green Belt

- D.9.3.1 The Green Belt Assessment was commissioned to review the potential release of Green Belt sites for development³, based on their contribution to the purposes of the Green Belt (weak, moderate, or strong).
- D.9.3.2 66 of the reasonable alternative sites are located outside the Green Belt and therefore can be expected to result in a minor positive impact on the landscape.
- D.9.3.3 Six of the reasonable alternative sites are located within areas classified as 'weak' and therefore can be expected to result in a negligible impact on the landscape.
- D.9.3.4 27 of the reasonable alternative sites are located within the areas classified as 'strong' and therefore can be expected to result in a major negative impact on the landscape. 28 of

¹ 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: 17/05/23]

² 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: 17/05/23]

³ 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: 17/05/23]

the reasonable alternative sites are located within the areas classified as 'moderate' and therefore can be expected to result in a minor negative impact on the landscape.

- D.9.3.5 The remaining sites are within the Green Belt; however, these were not located in any of the classifications within The Green Belt Assessment and are therefore uncertain as to whether they will have any impact on the landscape.

D.9.4 Alter Views for PRow Network Users

- D.9.4.1 66 of the reasonable alternative sites have potential to alter the views of the countryside landscape experienced by PRow users and therefore can be expected to result in a minor negative impact on the surrounding landscape.

- D.9.4.2 The remaining sites are not in close proximity to, adjacent, or coinciding with the PRow network and would therefore not be considered in this assessment.

D.9.5 Urbanisation of the Countryside

- D.9.5.1 86 of the reasonable alternative sites are considered to increase the risk of urbanisation / sprawl of development into the countryside and would be expected to have a minor negative impact on the landscape. Specifically, sites within the Audley cluster and Talke and Butt Lane cluster pose a high risk of urban sprawl.

D.9.6 Coalescence

- D.9.6.1 14 sites would be expected to increase the risk of reducing separation between existing settlements, leading to potential coalescence and loss of identity for these settlements. This includes large sites situated between Keele and the suburbs of Newcastle-under-Lyme. Therefore, these sites would be expected to result in a minor negative impact on the landscape.

D.9.7 Tree Preservation Orders

- D.9.7.1 17 sites are located adjacent to TPOs and could have adverse impacts on these trees and their protected status, therefore could be expected to result in a minor negative impact on the landscape.
- D.9.7.2 19 sites proposed for development coincide with TPOs and could have adverse impacts on these trees and their protected status, therefore it can be expected to result in a minor negative impact on landscape. Site TB19 of 45ha notably coincides and is adjacent to a total of eight TPOs.

Table D.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
AB4	Mixed use	0	--	+/-	-	-	0	0
AB12	Housing	0	--	--	0	-	0	0
AB15	Housing	-	--	-	0	0	0	0
AB16	Housing	-	-	--	-	-	0	0
AB22	Housing	-	--	-	0	-	0	0
AB27	Housing	-	-	+	-	0	0	0
AB30	Mixed use (housing, education and sports)	-	-	--	-	0	0	0
AB32	Housing	-	--	--	0	-	0	0
AB33	Housing	-	--	--	0	-	0	0
AB34	Housing	-	--	-	-	-	0	0
AB37	Housing	-	--	--	-	-	0	0
AB72	Housing	0	-	--	0	-	0	0
AB73	Housing	0	--	-	-	-	0	0
AB75	Mixed use	0	--	--	-	-	0	0
AB77	Mixed use	-	--	--	-	-	0	0
AB78	Housing	-	--	+/-	0	-	0	0
AB79	Housing	-	--	+/-	-	-	0	0
HD26	Housing	-	-	--	0	-	0	0
HM8	Housing	-	-	--	-	0	-	0
HM10	Housing	-	-	--	0	-	0	0
HM15	Housing	0	-	+/-	-	-	0	0
HM22	Housing	0	-	+/-	-	-	0	0
HM66	Housing	-	-	--	0	-	0	0
CL6	Housing	0	0	+	0	0	0	0
CL8	Housing	-	--	-	0	-	0	0
SB12	Housing	0	0	+	0	0	0	-
CT1	Housing	-	-	0	-	-	-	0
CT10	Employment or Housing	0	0	+	-	0	0	0
CT20	Employment	0	-	+	0	0	0	0
CT25	Housing	-	-	--	-	-	-	0
CH3	Housing	0	0	+	0	0	-	0
CH13	Housing	0	0	+	0	0	0	0
CH14	Housing	0	0	+	0	0	0	0
KS3	Housing	0	0	+	-	0	0	0
KS11	Housing	0	0	+	0	0	0	0
KS17	Housing	0	0	+	-	0	0	0
KS18	Housing	0	0	+	0	0	0	0
KS19	Housing	0	0	+	0	0	0	0
KL9	Housing	-	--	-	-	-	0	0
KL12	Housing	-	--	-	-	-	0	-
KL13	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
KL14	Mixed use	-	--	-	0	-	-	-
KL15	Mixed use	-	--	-	0	-	-	-
KL20	Housing	-	--	-	0	-	0	-
KL21	Mixed use	-	--	+/-	-	-	0	-
KL33	Housing	-	--	+/-	0	-	0	0
KL34	Housing	-	--	+/-	-	-	0	-
KG6	Housing	0	0	+	0	0	0	0
KG26	Housing	0	0	+	0	0	0	0
RC4	Housing	0	0	+	0	0	0	0
RC8	Housing	0	0	+	0	0	0	0
LW14	Housing	0	--	+	-	0	0	0
LW23	Housing	0	--	+	0	-	0	0
LW27	Housing	0	--	+	-	-	0	0
LW29	Housing	-	--	+	0	-	0	0
LW30	Housing	-	--	+	-	-	0	0
LW41	Housing	-	--	+	0	-	0	0
LW49	Housing	-	--	+	0	-	0	0
LW53	Housing	-	--	+	0	-	0	0
LW54	Housing	-	--	+	0	-	0	0
LW81	Housing	-	--	+	0	0	0	0
LW82	Housing	-	--	+	0	0	0	0
LW87	Housing	0	--	+	0	0	0	0
HM4	Housing	0	--	+/-	-	-	0	0
HM28	Housing	0	--	+	0	0	0	-
HM29	Housing	0	--	+/-	-	0	0	0
MD2	Housing	0	-	0	-	0	0	-
MD5	Housing	0	-	+	0	0	0	0
MD11	Mixed use	0	-	0	0	-	0	0
MD12	Mixed use	-	-	-	-	0	0	-
MD13	Housing	-	-	--	0	-	0	-
MD18	Housing	-	-	--	-	-	0	0
MD19	Housing	0	-	--	0	0	0	0
MD20	Mixed use (housing, education and sports)	-	-	-	-	-	0	0
MD25	Housing	0	-	+	-	-	0	0
MD29	Housing	-	-	+	-	-	0	-
MD30	Housing	0	-	+	-	-	0	-
MD32	Housing	-	-	+	0	-	0	0
MD33	Housing	0	-	+	-	-	0	0
MD34	Housing	-	-	0	0	-	0	-
MD39	Housing	-	-	+	-	-	0	0
MD40	Housing	0	-	+	0	0	0	0
MD56	Housing	-	-	-	-	-	0	-
LW6	Mixed use	-	--	+	-	-	0	0

Site Ref	Proposed Site Use	Landscape Character	Landscape Sensitivity	Green Belt	Views from the PRoW Network	Urbanisation of the Countryside	Coalescence	TPOs
LW7	Housing	-	--	+/-	-	-	0	0
LW9	Housing	-	--	+	-	-	0	0
LW38	Housing	-	--	+	0	-	0	0
LW42	Housing	-	--	+	0	0	0	0
LW48	Housing	-	--	+	-	-	0	0
LW74	Housing	0	--	+	0	-	0	0
LW78	Housing	-	--	+	0	-	0	0
LW83	Housing	0	-	+	0	-	0	0
LW84	Housing	-	--	+	0	-	0	0
LW86	Mixed use	-	--	+	-	-	0	0
NC13	Housing	-	-	-	-	0	0	0
NC77	Mixed use	0	-	-	-	0	0	0
NC78	Housing	0	-	--	-	-	0	0
NC80	Housing	0	-	--	-	-	0	0
NC81	Housing	-	-	--	-	-	0	0
NC83	Housing	0	-	+/-	0	-	0	0
SP2	Housing	0	0	+	0	0	0	-
SP11	Housing	-	--	-	-	-	-	-
SP12	Housing	-	--	-	-	-	0	-
SP14	Housing	-	--	-	0	-	0	-
SP22	Housing	0	0	+	0	0	0	0
SP23	Housing	-	--	-	-	-	0	-
BL3	Housing	0	0	+	-	0	0	0
BL8	Mixed use	0	0	+	-	0	0	0
BL18	Housing	-	-	-	-	0	0	-
BL24	Housing	0	0	+	0	0	0	0
BL32	Mixed use	0	0	+	-	0	0	0
TK6	Housing	0	-	+	0	0	0	0
TK10	Housing	-	-	--	-	-	0	0
TK17	Housing	-	-	0	-	0	0	0
TK18	Mixed use	-	-	--	-	-	-	0
TK24	Housing	0	-	-	0	-	0	-
TK25	Mixed use	0	-	--	-	-	0	0
TK27	Housing	0	-	-	-	-	0	0
TK30	Mixed use	-	-	-	-	-	-	-
TK45	Employment	-	-	--	-	-	-	0
TK46	Housing	-	-	--	-	-	-	0
TK47	Employment	-	-	--	-	-	-	0
TB6	Housing	0	0	+	0	0	0	0
TB19	Mixed use	-	--	-	0	-	-	-
TB23	Housing	0	0	+	-	0	0	-
TB24	Housing	0	--	0	0	-	0	-
MB12	Housing	0	0	+	0	0	0	-
MB13	Housing	0	0	+	0	0	0	0

Site Ref	Proposed Site Use	Landscape Character	Landscape Sensitivity	Green Belt	Views from the PRoW Network	Urbanisation of the Countryside	Coalescence	TPOs
MB15	Housing	0	0	+	0	0	0	0
TC7	Mixed use	0	0	+	0	0	0	0
TC22	Mixed use	0	0	+	0	0	0	0
TC40	Housing	0	0	+	0	0	0	0
TC45	Employment	0	0	+	0	0	0	0
Site 1	Gypsy and Traveller	-	-	-	0	-	0	0
Site 2	Gypsy and Traveller	-	-	-	-	-	0	0
Site 3	Gypsy and Traveller	0	-	--	-	-	0	0
Site 4	Gypsy and Traveller	0	0	+	-	0	0	0
Site 5	Gypsy and Traveller	0	--	-	0	-	0	0
Site 6	Gypsy and Traveller	0	0	+	0	0	0	0
Site 7	Gypsy and Traveller	0	-	-	0	0	0	0

D.10 SA Objective 9: Health and Wellbeing

D.10.1 NHS Hospital with Accident & Emergency Department

- D.10.1.1 Newcastle-Under-Lyme is not home to any hospitals within its boundaries, although Royal Stoke University Hospital which provides an Accident and Emergency (A&E) department is located in Stoke-on-Trent. 37 of the reasonable alternative sites are located within 5km of a hospital and could therefore potentially have a minor positive impact on access to emergency healthcare due to being within a sustainable distance to the services. The remaining 104 sites are located beyond 5km of a hospital and would be expected to have a minor negative impact on access to emergency healthcare.

D.10.2 GP Surgery

- D.10.2.1 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 restricted access to healthcare and the area sees less GP coverage.
- D.10.2.2 12 of the reasonable alternative sites are located within 200m of a GP surgery and can therefore be expected to have a major positive impact on access to healthcare. Nine 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. 40 of the reasonable alternative sites are located within 800m of a GP surgery and can therefore expect to have a negligible impact on access to healthcare. 80 of the reasonable alternative sites are located beyond 800m from a GP surgery and therefore can be expected to have a minor negative impact on access to healthcare.

D.10.3 Leisure Facilities

- D.10.3.1 It is expected that Newcastle-under-Lyme should offer various leisure facilities to new and current residents to 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 restricted access to leisure facilities.
- D.10.3.2 Three of the reasonable alternative sites are located within 400m of a leisure facility, these being all from the Town Centre cluster (TC22, TC7 and TC45). The three sites would therefore be expected to have a major positive impact on access to leisure facilities. Four sites are located within 800m of leisure facilities, being mainly from May Bank and Town Centre (MB12, MB13, MB15 and TC40). These four sites would therefore be expected to have a minor positive impact on access to leisure facilities.
- D.10.3.3 The remaining 134 reasonable alternative sites are located beyond 1.2km from leisure facilities, therefore can be expected to have a minor negative impact on access to leisure facilities.

D.10.4 Access to and Provision of Open / Green Space

- D.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.
- D.10.4.2 The majority of sites have good access to open/green space. 32 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. 55 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. 21 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.
- D.10.4.3 20 sites are located outside the catchment of freely accessible open/green space and therefore can be expected to have a minor negative impact on access to open/green space.
- D.10.4.4 Nine sites coincide with freely accessible open/green space and therefore can be expected to have a major negative impact on the provision of open/green space. Site AB16, notably coincides with the entirety of Boyles Hall Estate, with AB16 being 28ha; thereby resulting in a potential significant loss of freely accessible open/green space.
- D.10.4.5 Four sites coincide with 'limited' or 'unconfirmed' open/green space and therefore there is uncertainty surrounding the potential for a net loss of open/green space for these four sites. These four sites are BL3, KL14, KS17 and Gypsy and Traveller Site 2.

Table D.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
AB4	Mixed use	-	-	-	0
AB12	Housing	-	-	-	+
AB15	Housing	-	+	-	+
AB16	Housing	-	0	-	--
AB22	Housing	-	0	-	+
AB27	Housing	-	-	-	++
AB30	Mixed use (housing, education and sports)	-	-	-	+
AB32	Housing	-	0	-	++
AB33	Housing	-	0	-	++
AB34	Housing	-	-	-	+
AB37	Housing	-	0	-	++
AB72	Housing	-	-	-	++
AB73	Housing	-	0	-	++
AB75	Mixed use	-	-	-	+
AB77	Mixed use	-	-	-	0
AB78	Housing	-	-	-	0
AB79	Housing	-	-	-	+
HD26	Housing	-	-	-	++
HM8	Housing	-	-	-	+
HM10	Housing	-	-	-	++

Site Ref	Proposed Site Use	NHS Hospital	GP Surgery	Leisure Facilities	Open / Green Space
HM15	Housing	-	-	-	++
HM22	Housing	-	-	-	++
HM66	Housing	-	0	-	+
CL6	Housing	+	0	-	+
CL8	Housing	+	0	-	+
SB12	Housing	+	++	-	+
CT1	Housing	-	-	-	+
CT10	Employment or Housing	+	++	-	--
CT20	Employment	+	0	-	+
CT25	Housing	-	-	-	++
CH3	Housing	+	0	-	--
CH13	Housing	+	0	-	--
CH14	Housing	+	0	-	++
KS3	Housing	+	0	-	++
KS11	Housing	+	++	-	++
KS17	Housing	+	++	-	+/-
KS18	Housing	+	++	-	++
KS19	Housing	+	0	-	++
KL9	Housing	-	-	-	+
KL12	Housing	+	-	-	+
KL13	Mixed use	+	-	-	+
KL14	Mixed use	+	-	-	+/-
KL15	Mixed use	+	-	-	+
KL20	Housing	-	-	-	+
KL21	Mixed use	+	-	-	+
KL33	Housing	+	-	-	+
KL34	Housing	-	-	-	+
KG6	Housing	-	0	-	+
KG26	Housing	-	0	-	+
RC4	Housing	-	+	-	+
RC8	Housing	-	0	-	+
LW14	Housing	-	-	-	+
LW23	Housing	-	-	-	0
LW27	Housing	-	-	-	0
LW29	Housing	-	-	-	-
LW30	Housing	-	-	-	-
LW41	Housing	-	-	-	-
LW49	Housing	-	-	-	+
LW53	Housing	-	-	-	+
LW54	Housing	-	-	-	+
LW81	Housing	-	-	-	+
LW82	Housing	-	-	-	+
LW87	Housing	-	-	-	++
HM4	Housing	-	0	-	-
HM28	Housing	-	-	-	+
HM29	Housing	-	0	-	-
MD2	Housing	-	-	-	0
MD5	Housing	-	-	-	--
MD11	Mixed use	-	-	-	0

Site Ref	Proposed Site Use	NHS Hospital	GP Surgery	Leisure Facilities	Open / Green Space
MD12	Mixed use	-	-	-	0
MD13	Housing	-	0	-	0
MD18	Housing	-	0	-	-
MD19	Housing	-	0	-	0
MD20	Mixed use (housing, education and sports)	-	-	-	0
MD25	Housing	-	0	-	0
MD29	Housing	-	0	-	-
MD30	Housing	-	0	-	-
MD32	Housing	-	++	-	-
MD33	Housing	-	0	-	0
MD34	Housing	-	-	-	0
MD39	Housing	-	-	-	0
MD40	Housing	-	+	-	-
MD56	Housing	-	-	-	0
LW6	Mixed use	-	+	-	-
LW7	Housing	+	-	-	0
LW9	Housing	-	-	-	-
LW38	Housing	-	0	-	-
LW42	Housing	-	-	-	-
LW48	Housing	-	0	-	-
LW74	Housing	-	0	-	-
LW78	Housing	-	0	-	-
LW83	Housing	-	-	-	-
LW84	Housing	-	-	-	-
LW86	Mixed use	-	-	-	-
NC13	Housing	-	-	-	+
NC77	Mixed use	-	-	-	+
NC78	Housing	-	-	-	+
NC80	Housing	-	-	-	0
NC81	Housing	-	-	-	0
NC83	Housing	-	-	-	0
SP2	Housing	-	-	-	++
SP11	Housing	+	-	-	+
SP12	Housing	+	0	-	++
SP14	Housing	+	-	-	+
SP22	Housing	+	0	-	++
SP23	Housing	+	-	-	+
BL3	Housing	-	0	-	+/-
BL8	Mixed use	-	+	-	+
BL18	Housing	-	-	-	++
BL24	Housing	-	++	-	+
BL32	Mixed use	-	++	-	+
TK6	Housing	-	-	-	+
TK10	Housing	-	+	-	+
TK17	Housing	-	+	-	++
TK18	Mixed use	-	0	-	+
TK24	Housing	-	-	-	+
TK25	Mixed use	-	-	-	+

Site Ref	Proposed Site Use	NHS Hospital	GP Surgery	Leisure Facilities	Open / Green Space
TK27	Housing	-	-	-	+
TK30	Mixed use	-	-	-	++
TK45	Employment	-	-	-	--
TK46	Housing	-	-	-	+
TK47	Employment	-	-	-	++
TB6	Housing	+	0	-	++
TB19	Mixed use	+	-	-	+
TB23	Housing	+	-	-	++
TB24	Housing	+	-	-	++
MB12	Housing	+	++	+	++
MB13	Housing	+	0	+	++
MB15	Housing	+	0	+	++
TC7	Mixed use	+	++	++	+
TC22	Mixed use	+	++	++	++
TC40	Housing	+	++	+	++
TC45	Employment	+	+	++	+
Site 1	Gypsy and Traveller	-	-	-	+
Site 2	Gypsy and Traveller	+	-	-	+/-
Site 3	Gypsy and Traveller	-	0	-	+
Site 4	Gypsy and Traveller	-	+	-	--
Site 5	Gypsy and Traveller	-	-	-	--
Site 6	Gypsy and Traveller	-	0	-	--
Site 7	Gypsy and Traveller	-	-	-	+

D.11 SA Objective 10: Equality

D.11.1 Housing Provision

- D.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 would 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 would be expected to result in a minor positive impact on housing provision. This includes the majority of carried forward residential sites, with 46 providing a capacity of 100 or more dwellings, therefore being a major positive impact on housing provision and 89 sites providing capacity of 99 or less dwellings, expecting a minor positive impact on housing provision.
- D.11.1.2 Five sites that are proposed to be used for employment would have a negligible impact on housing provision as these would not expect to result in a net change in housing provision. These sites are AB2, C20, TC45, TK45 and TK47.
- D.11.1.3 Site CH13 would expect to result in a major negative impact on housing provision due to a net loss of 19 dwellings.

D.11.2 Deprivation

- D.11.2.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England⁴. Of the 316 local authorities in England, Newcastle-under-Lyme is ranked 159th most deprived⁵. According to the IMD (2019)⁶, 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.
- D.11.2.2 Four of the total 141 reasonable alternative sites are located wholly or partially within the 10% most deprived LSOAs. These four sites are CH13, CH14, KS11 and KS19. These four sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and would also place increased pressure on local services.

⁴ 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: 17/05/23]

⁵ Office for National Statistics (2021) Income Deprivation. Available at: <https://www.ons.gov.uk/visualisations/dvc1371/#/E07000195> [Date accessed: 17/05/23]

⁶ 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: 17/05/23]

- D.11.2.3 The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites in Newcastle-under-Lyme may have a negligible impact on equality.
- D.11.2.4 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.

Table D.11.1: Sites impact matrix for SA Objective 10 – Equality

Site Ref	Proposed Site Use	Housing Provision	Deprivation
AB2	Employment	0	0
AB4	Mixed use	++	0
AB12	Housing	++	0
AB15	Housing	+	0
AB16	Housing	++	0
AB22	Housing	++	0
AB27	Housing	+	0
AB30	Mixed use (housing, education and sports)	++	0
AB32	Housing	+	0
AB33	Housing	+	0
AB34	Housing	++	0
AB37	Housing	++	0
AB72	Housing	+	0
AB73	Housing	+	0
AB75	Mixed use	++	0
AB77	Mixed use	++	0
AB78	Housing	+	0
AB79	Housing	++	0
HD26	Housing	+	0
HM8	Housing	++	0
HM10	Housing	+	0
HM15	Housing	+	0
HM22	Housing	+	0
HM66	Housing	+	0
CL6	Housing	+	0
CL8	Housing	+	0
SB12	Housing	+	0
CT1	Housing	++	0
CT10	Employment or Housing	++	0
CT20	Employment	0	0
CT25	Housing	++	0
CH3	Housing	++	0
CH13	Housing	--	-
CH14	Housing	+	-
KS3	Housing	++	0
KS11	Housing	+	-
KS17	Housing	+	0
KS18	Housing	+	0
KS19	Housing	+	-
KL9	Housing	++	0

Site Ref	Proposed Site Use	Housing Provision	Deprivation
KL12	Housing	+	0
KL13	Mixed use	++	0
KL14	Mixed use	+	0
KL15	Mixed use	++	0
KL20	Housing	+	0
KL21	Mixed use	++	0
KL33	Housing	+	0
KL34	Housing	++	0
KG6	Housing	+	0
KG26	Housing	+	0
RC4	Housing	+	0
RC8	Housing	+	0
LW14	Housing	+	0
LW23	Housing	+	0
LW27	Housing	+	0
LW29	Housing	+	0
LW30	Housing	+	0
LW41	Housing	+	0
LW49	Housing	+	0
LW53	Housing	++	0
LW54	Housing	++	0
LW81	Housing	+	0
LW82	Housing	+	0
LW87	Housing	+	0
HM4	Housing	+	0
HM28	Housing	+	0
HM29	Housing	+	0
MD2	Housing	+	0
MD5	Housing	+	0
MD11	Mixed use	+	0
MD12	Mixed use	++	0
MD13	Housing	++	0
MD18	Housing	+	0
MD19	Housing	+	0
MD20	Mixed use (housing, education and sports)	++	0
MD25	Housing	+	0
MD29	Housing	++	0
MD30	Housing	+	0
MD32	Housing	+	0
MD33	Housing	+	0
MD34	Housing	++	0
MD39	Housing	+	0
MD40	Housing	+	0
MD56	Housing	++	0
LW6	Mixed use	+	0
LW7	Housing	++	0
LW9	Housing	+	0
LW38	Housing	+	0
LW42	Housing	+	0

Site Ref	Proposed Site Use	Housing Provision	Deprivation
LW48	Housing	+	0
LW74	Housing	++	0
LW78	Housing	+	0
LW83	Housing	+	0
LW84	Housing	+	0
LW86	Mixed use	+	0
NC13	Housing	++	0
NC77	Mixed use	+	0
NC78	Housing	+	0
NC80	Housing	++	0
NC81	Housing	++	0
NC83	Housing	+	0
SP2	Housing	+	0
SP11	Housing	++	0
SP12	Housing	+	0
SP14	Housing	++	0
SP22	Housing	+	0
SP23	Housing	++	0
BL3	Housing	++	0
BL8	Mixed use	+	0
BL18	Housing	++	0
BL24	Housing	+	0
BL32	Mixed use	+	0
TK6	Housing	+	0
TK10	Housing	++	0
TK17	Housing	+	0
TK18	Mixed use	++	0
TK24	Housing	+	0
TK25	Mixed use	++	0
TK27	Housing	+	0
TK30	Mixed use	++	0
TK45	Employment	0	0
TK46	Housing	++	0
TK47	Employment	0	0
TB6	Housing	+	0
TB19	Mixed use	++	0
TB23	Housing	++	0
TB24	Housing	+	0
MB12	Housing	+	0
MB13	Housing	+	0
MB15	Housing	+	0
TC7	Mixed use	+	0
TC22	Mixed use	+	0
TC40	Housing	+	0
TC45	Employment	0	0
Site 1	Gypsy and Traveller	+	0
Site 2	Gypsy and Traveller	+	0
Site 3	Gypsy and Traveller	+	0
Site 4	Gypsy and Traveller	+	0

Site Ref	Proposed Site Use	Housing Provision	Deprivation
Site 5	Gypsy and Traveller	+	0
Site 6	Gypsy and Traveller	+	0
Site 7	Gypsy and Traveller	+	0

D.12 SA Objective 11: Transport and Accessibility

D.12.1 Bus Stop

D.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. 59 sites are located within 200m of a bus stop; therefore, these sites would be expected to have a major positive impact on access to public transport. 42 sites are located within 400m of a bus stop and are expected to have a minor positive impact on access to public transport. 32 sites are located within 800m of a bus stop and are therefore expected to have a negligible impact on access to public transport. Eight sites are located beyond 800m from a bus stop and therefore are deemed to have a minor negative impact on access to public transport. Of these eight sites four are from the Audley cluster.

D.12.2 Train Station

D.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. Five sites proposed for development are located within 800m of a train station, with all five of these sites being closest to Kidsgrove Station. The five sites being BL3, KG6, KG26, RC4 and RC8. These five sites are therefore identified as having a minor positive impact on access to public transport. Four sites are located within 1.2km of a train station, these are sites BL18, BL24, B32 and Gypsy and Traveller Site 6. All four of these sites are located closest to Kidsgrove Station. The remaining 132 sites are located over 1.2km from the nearest train station and therefore the proposed development at these sites would have a minor negative impact on access to public transport.

D.12.3 Pedestrian Access

D.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, a large amount of the sites proposed for development are situated in a rural setting and can therefore have poor pedestrian access.

D.12.3.2 86 of the reasonable alternative sites are well connected to the existing footpath network and would therefore likely have a minor positive impact on local transport and accessibility. Utilising the existing footpath network would encourage travel by foot and reduce the requirement for new pedestrian access to be created. However, 55 sites have poor access to the existing footpath network. As a result, development at these 55 sites could potentially have a minor negative impact on local accessibility and would require improvement of pedestrian access to the wider community in order for the sites to be considered a viable transport option.

D.12.4 Cycle Access

- D.12.4.1 Sites deemed to have good cycle access are those sites that can provide adequate access to the surrounding cycle network. 15 sites proposed for development have good access to the surrounding cycle network and would be expected to have a minor positive impact on access to public transport. The remaining 126 sites have no access to the surrounding cycle network, and it would be expected that development on these sites would have a minor negative impact on access to public transport.

D.12.5 Access to Primary School

- D.12.5.1 There are 41 primary schools distributed throughout Newcastle-Under-Lyme.
- D.12.5.2 Ten residential sites proposed for development are located within 200m of a primary school and therefore would be expected to have a major positive impact on accessibility to primary schools. 29 of the proposed residential sites are located within 400m of a primary school and would therefore be expected to have a minor positive impact on accessibility to primary schools. 44 of the proposed residential sites are located within 800m of a primary school and would therefore be expected to have a negligible impact on accessibility to primary schools. 53 of the proposed residential sites are located beyond 800m from the nearest primary school and would therefore be expected to have a minor negative impact on accessibility to primary schools.
- D.12.5.3 Five sites proposed for employment have not been included in this assessment, sites AB2, CT20, TK45, TK47, TC45.

D.12.6 Access to Secondary School

- D.12.6.1 There are nine secondary schools distributed throughout Newcastle-under-Lyme. Six residential sites proposed for development are located within 400m of a secondary school and can be expected to have a major positive impact on accessibility to secondary schools. 20 residential sites proposed for development are located within 800m of a secondary school and can be expected to have a minor positive impact on accessibility to secondary schools. 31 of the proposed residential sites for development are located within 1.2km of a secondary school and can be expected to have a negligible impact on accessibility to secondary schools.
- D.12.6.2 However, the majority of sites have poor access to secondary schools, with 79 residential sites proposed for development located beyond 1.2km from a secondary school and can be expected to have a minor negative impact on accessibility to secondary schools.
- D.12.6.3 Five sites proposed for employment have not been included in this assessment, sites AB2, CT20, TK45, TK47, TC45.

D.12.7 Access to Employment Opportunities

- D.12.7.1 It is expected that Newcastle-Under-Lyme would provide a range of employment opportunities for new and current residents. Newcastle-under-Lyme is home to various

key employment areas, with the majority of business parks and industrial estates being located to the east of the borough.

D.12.7.2 34 of the proposed residential sites are located within 400m of key employment areas and can be expected to have a major positive impact on access to employment opportunities. 29 of the proposed residential sites are located within 800m of key employment areas and can be expected to have a minor positive impact on access to employment opportunities. 15 of the proposed residential sites are located within 1.2km of key employment areas and can be expected to have a negligible impact on access to employment opportunities. 58 of the proposed residential sites are located beyond 1.2km from key employment areas and can be expected to have a minor negative impact on access to employment opportunities.

D.12.7.3 Five sites proposed for employment have not been included in this assessment, sites AB2, CT20, TK45, TK47, TC45.

D.12.8 Access to Local Services

D.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 and the uptake of public transport services.

D.12.8.2 14 of the reasonable alternative sites are located within 200m of local services and can expect to have a major positive impact on access to local services. 33 of the reasonable alternative sites are located within 400m of local services and can expect to have a minor positive impact on access to local services. 45 of the reasonable alternative sites are located within 800m of local services and can expect to have a negligible impact on access to local services. 49 of the reasonable alternative sites are located beyond 800m of local services and can expect to have a minor negative impact on access to local services.

Table D.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	-
AB4	Mixed use	-	-	-	-	-	-	0	-
AB12	Housing	++	-	-	-	0	-	0	++
AB15	Housing	++	-	+	-	-	-	+	+
AB16	Housing	+	-	-	+	0	-	+	0
AB22	Housing	+	-	-	-	-	-	0	0
AB27	Housing	++	-	-	-	++	-	-	-
AB30	Mixed use (housing, education and sports)	++	-	+	-	0	-	-	0
AB32	Housing	+	-	-	-	0	-	++	+
AB33	Housing	+	-	-	-	0	-	++	+
AB34	Housing	0	-	-	-	-	-	0	-
AB37	Housing	0	-	-	-	0	-	++	+

Site Ref	Proposed Site Use	Bus Stop	Train Station	Pedestrian Access	Cycle Access	Primary School	Secondary School	Employment	Local Services
AB72	Housing	+	-	+	+	-	+	-	0
AB73	Housing	+	-	-	-	-	+	-	0
AB75	Mixed use	+	-	-	-	0	-	-	+
AB77	Mixed use	-	-	+	-	-	-	++	0
AB78	Housing	-	-	-	-	-	-	+	-
AB79	Housing	0	-	-	-	0	-	+	0
HD26	Housing	++	-	-	-	-	++	-	+
HM8	Housing	+	-	+	-	-	++	-	+
HM10	Housing	+	-	-	-	0	+	-	0
HM15	Housing	++	-	-	-	-	-	0	-
HM22	Housing	++	-	-	-	-	-	0	-
HM66	Housing	+	-	+	-	-	0	0	+
CL6	Housing	++	-	+	-	0	+	-	++
CL8	Housing	++	-	-	-	-	++	-	0
SB12	Housing	++	-	+	+	++	++	-	+
CT1	Housing	+	-	+	-	0	-	+	-
CT10	Employment or Housing	++	-	+	-	++	0	++	++
CT20	Employment	+	-	+	-	0	0	0	0
CT25	Housing	+	-	+	-	-	-	0	-
CH3	Housing	++	-	+	+	++	++	+	+
CH13	Housing	++	-	+	-	+	+	+	0
CH14	Housing	++	-	+	-	-	0	++	0
KS3	Housing	0	-	+	-	0	-	++	0
KS11	Housing	++	-	+	-	+	0	++	++
KS17	Housing	++	-	+	-	++	0	++	++
KS18	Housing	++	-	+	-	+	0	++	++
KS19	Housing	++	-	+	-	0	+	+	+
KL9	Housing	+	-	+	-	0	-	0	0
KL12	Housing	++	-	+	+	0	-	++	0
KL13	Mixed use	0	-	-	+	-	0	++	0
KL14	Mixed use	0	-	-	-	-	0	0	-
KL15	Mixed use	0	-	+	-	0	+	+	-
KL20	Housing	0	-	+	-	0	-	+	-
KL21	Mixed use	0	-	+	-	+	-	0	+
KL33	Housing	+	-	+	-	+	-	+	+
KL34	Housing	+	-	+	-	0	-	-	+
KG6	Housing	++	+	+	-	+	++	++	0
KG26	Housing	++	+	+	-	+	+	++	0
RC4	Housing	++	+	+	-	+	+	++	+
RC8	Housing	++	+	+	+	++	+	++	0
LW14	Housing	0	-	-	-	-	-	-	-
LW23	Housing	+	-	-	-	-	-	-	-
LW27	Housing	+	-	+	-	-	-	-	-
LW29	Housing	0	-	-	-	-	-	-	-

Site Ref	Proposed Site Use	Bus Stop	Train Station	Pedestrian Access	Cycle Access	Primary School	Secondary School	Employment	Local Services
LW30	Housing	0	-	-	-	-	-	-	-
LW41	Housing	0	-	-	-	-	-	-	-
LW49	Housing	+	-	-	-	-	-	-	0
LW53	Housing	0	-	+	-	-	-	-	-
LW54	Housing	0	-	-	-	-	-	-	0
LW81	Housing	-	-	-	-	-	-	-	-
LW82	Housing	+	-	-	-	-	-	-	0
LW87	Housing	++	-	+	-	+	-	-	++
HM4	Housing	++	-	+	-	-	-	-	-
HM28	Housing	++	-	-	-	+	-	-	+
HM29	Housing	++	-	+	-	-	-	-	-
MD2	Housing	0	-	+	-	-	-	-	-
MD5	Housing	+	-	-	-	+	-	-	-
MD11	Mixed use	0	-	-	-	-	-	-	-
MD12	Mixed use	+	-	+	-	+	0	-	-
MD13	Housing	+	-	-	-	-	+	-	0
MD18	Housing	0	-	-	-	-	+	-	+
MD19	Housing	+	-	-	-	-	+	-	++
MD20	Mixed use (housing, education and sports)	+	-	+	-	0	+	0	+
MD25	Housing	+	-	+	-	+	0	+	0
MD29	Housing	+	-	-	-	+	0	+	0
MD30	Housing	0	-	+	-	0	0	0	0
MD32	Housing	++	-	+	-	+	+	0	+
MD33	Housing	+	-	+	-	+	0	+	0
MD34	Housing	0	-	-	-	-	0	-	0
MD39	Housing	+	-	-	-	+	0	+	0
MD40	Housing	+	-	-	-	0	+	-	+
MD56	Housing	+	-	+	-	0	0	-	0
LW6	Mixed use	+	-	+	-	+	-	-	+
LW7	Housing	0	-	+	-	-	-	-	-
LW9	Housing	++	-	+	-	-	-	-	-
LW38	Housing	++	-	-	-	0	-	-	+
LW42	Housing	-	-	-	-	-	-	-	-
LW48	Housing	+	-	-	-	+	-	-	+
LW74	Housing	+	-	+	-	0	-	-	+
LW78	Housing	++	-	-	-	0	-	-	+
LW83	Housing	-	-	-	-	-	-	-	-
LW84	Housing	++	-	+	-	-	-	-	-
LW86	Mixed use	++	-	+	-	-	-	-	-
NC13	Housing	++	-	+	-	+	-	-	+
NC77	Mixed use	++	-	+	-	-	-	-	-
NC78	Housing	++	-	+	-	0	-	-	-
NC80	Housing	++	-	+	-	+	-	-	++
NC81	Housing	++	-	-	-	++	-	-	0

Site Ref	Proposed Site Use	Bus Stop	Train Station	Pedestrian Access	Cycle Access	Primary School	Secondary School	Employment	Local Services
NC83	Housing	++	-	+	-	-	0	-	-
SP2	Housing	++	-	+	-	+	-	++	-
SP11	Housing	0	-	+	-	0	-	+	0
SP12	Housing	0	-	+	-	+	-	+	0
SP14	Housing	0	-	+	+	0	0	+	-
SP22	Housing	++	-	+	-	0	-	+	0
SP23	Housing	0	-	-	-	0	-	++	+
BL3	Housing	+	+	-	-	0	+	++	0
BL8	Mixed use	+	-	+	-	+	-	++	0
BL18	Housing	++	0	+	+	0	0	+	+
BL24	Housing	++	0	+	-	++	0	++	++
BL32	Mixed use	++	0	+	-	++	0	++	++
TK6	Housing	++	-	+	-	0	-	++	0
TK10	Housing	+	-	-	-	0	-	++	0
TK17	Housing	++	-	+	+	+	-	+	+
TK18	Mixed use	0	-	+	-	0	-	++	0
TK24	Housing	++	-	-	-	0	-	+	-
TK25	Mixed use	0	-	-	-	-	-	++	-
TK27	Housing	++	-	+	-	0	-	+	-
TK30	Mixed use	0	-	+	-	0	-	+	-
TK45	Employment	-	-	+	-	0	0	0	-
TK46	Housing	0	-	-	-	-	-	++	0
TK47	Employment	0	-	+	-	0	0	0	-
TB6	Housing	++	-	+	-	0	+	0	++
TB19	Mixed use	+	-	+	-	-	0	-	-
TB23	Housing	+	-	+	-	0	0	-	0
TB24	Housing	+	-	+	+	0	+	-	0
MB12	Housing	++	-	+	-	0	-	-	+
MB13	Housing	++	-	-	-	0	0	++	-
MB15	Housing	++	-	+	-	0	0	++	0
TC7	Mixed use	++	-	+	+	+	+	++	+
TC22	Mixed use	++	-	+	+	+	0	++	+
TC40	Housing	++	-	+	+	+	0	++	+
TC45	Employment	++	-	+	-	0	0	0	++
Site 1	Gypsy and Traveller	0	-	-	-	-	-	+	-
Site 2	Gypsy and Traveller	0	-	+	-	-	0	++	-
Site 3	Gypsy and Traveller	+	-	+	-	-	0	-	0
Site 4	Gypsy and Traveller	++	-	+	-	++	0	++	++
Site 5	Gypsy and Traveller	+	-	-	-	-	-	-	-
Site 6	Gypsy and Traveller	++	0	+	+	+	0	+	0
Site 7	Gypsy and Traveller	++	-	+	-	-	-	-	-

D.13 SA Objective 12: Economy

D.13.1 Employment Floorspace Provision

- D.13.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- D.13.1.2 Ten sites proposed for development would likely result in a significant increase in employment floorspace of more than 10ha and therefore would be expected to provide a major positive impact on the provision of employment opportunities. Notably, sites AB2 and TK30 have over 50ha of developable employment area available. 12 sites proposed for development would likely result in a net gain in employment floorspace of up to 10ha and therefore would be expected to provide a minor positive impact on the provision of employment opportunities.
- D.13.1.3 Nine sites proposed for residential or mixed-use coincide with existing employment sites. Development on these sites could potentially result in a net loss of employment floorspace. All nine of these sites have the potential to cause a minor negative impact on employment floorspace due to the loss of small areas of employment land or small businesses.
- D.13.1.4 Six sites that have been proposed for employment or mixed-use development are deemed uncertain as to whether the development would result in a net change in employment floorspace. Site KL13 is a site of 26ha that coincides with multiple existing businesses including Caudwell Children Charity and Keele Vets, whilst also coinciding with Keele University and Harper and Keele Veterinary School. It is therefore uncertain if these land uses are currently active employment land.
- D.13.1.5 The remaining 104 sites proposed for development which include all of the Gypsy and Traveller sites, reside on previously undeveloped land, and would not be expected to result in a net change in employment floorspace. Proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

Table D.13.1: Sites impact matrix for SA Objective 12 – Economy

Site Ref	Proposed Site Use	Employment Floorspace
AB2	Employment	++
AB4	Mixed use	+
AB12	Housing	0
AB15	Housing	0
AB16	Housing	0
AB22	Housing	0
AB27	Housing	0
AB30	Mixed use (housing, education and sports)	+
AB32	Housing	0
AB33	Housing	0
AB34	Housing	0
AB37	Housing	0
AB72	Housing	0
AB73	Housing	0
AB75	Mixed use	+

Site Ref	Proposed Site Use	Employment Floorspace
AB77	Mixed use	++
AB78	Housing	0
AB79	Housing	0
HD26	Housing	-
HM8	Housing	0
HM10	Housing	0
HM15	Housing	0
HM22	Housing	0
HM66	Housing	0
CL6	Housing	0
CL8	Housing	0
SB12	Housing	0
CT1	Housing	0
CT10	Employment or Housing	+
CT20	Employment	+
CT25	Housing	0
CH3	Housing	0
CH13	Housing	0
CH14	Housing	-
KS3	Housing	0
KS11	Housing	-
KS17	Housing	-
KS18	Housing	0
KS19	Housing	0
KL9	Housing	0
KL12	Housing	0
KL13	Mixed use	+/-
KL14	Mixed use	+/-
KL15	Mixed use	++
KL20	Housing	0
KL21	Mixed use	++
KL33	Housing	0
KL34	Housing	0
KG6	Housing	0
KG26	Housing	0
RC4	Housing	0
RC8	Housing	0
LW14	Housing	0
LW23	Housing	0
LW27	Housing	0
LW29	Housing	0
LW30	Housing	0
LW41	Housing	0
LW49	Housing	0
LW53	Housing	0
LW54	Housing	0
LW81	Housing	0
LW82	Housing	0
LW87	Housing	-

Site Ref	Proposed Site Use	Employment Floorspace
HM4	Housing	0
HM28	Housing	0
HM29	Housing	0
MD2	Housing	-
MD5	Housing	0
MD11	Mixed use	+/-
MD12	Mixed use	++
MD13	Housing	0
MD18	Housing	0
MD19	Housing	0
MD20	Mixed use (housing, education and sports)	0
MD25	Housing	0
MD29	Housing	0
MD30	Housing	0
MD32	Housing	0
MD33	Housing	0
MD34	Housing	0
MD39	Housing	0
MD40	Housing	0
MD56	Housing	0
LW6	Mixed use	+
LW7	Housing	0
LW9	Housing	0
LW38	Housing	0
LW42	Housing	0
LW48	Housing	0
LW74	Housing	-
LW78	Housing	0
LW83	Housing	0
LW84	Housing	0
LW86	Mixed use	+/-
NC13	Housing	0
NC77	Mixed use	+
NC78	Housing	0
NC80	Housing	0
NC81	Housing	0
NC83	Housing	0
SP2	Housing	-
SP11	Housing	-
SP12	Housing	0
SP14	Housing	0
SP22	Housing	0
SP23	Housing	0
BL3	Housing	0
BL8	Mixed use	+
BL18	Housing	0
BL24	Housing	0
BL32	Mixed use	+
TK6	Housing	0

Site Ref	Proposed Site Use	Employment Floorspace
TK10	Housing	0
TK17	Housing	0
TK18	Mixed use	++
TK24	Housing	0
TK25	Mixed use	++
TK27	Housing	0
TK30	Mixed use	++
TK45	Employment	+
TK46	Housing	0
TK47	Employment	++
TB6	Housing	0
TB19	Mixed use	++
TB23	Housing	0
TB24	Housing	0
MB12	Housing	0
MB13	Housing	0
MB15	Housing	0
TC7	Mixed use	+
TC22	Mixed use	+
TC40	Housing	0
TC45	Employment	+/-
Site 1	Gypsy and Traveller	0
Site 2	Gypsy and Traveller	0
Site 3	Gypsy and Traveller	0
Site 4	Gypsy and Traveller	0
Site 5	Gypsy and Traveller	0
Site 6	Gypsy and Traveller	0
Site 7	Gypsy and Traveller	0

Appendix E: Draft Policy Assessments

Appendix E Contents

E.1	Overview.....	E1
E.1.1	Introduction.....	E1
E.1.2	Overview of policy assessments.....	E2
E.2	Vision and Objectives	E4
E.2.1	Vision for the Borough.....	E4
E.2.2	Strategic Objectives.....	E5
E.3	Planning for Sustainable Development.....	E8
E.3.1	Policy PSD1: Overall Development Strategy	E8
E.3.2	Policy PSD2: Settlement Hierarchy	E9
E.3.3	Policy PSD3: Distribution of Development	E12
E.3.4	Policy PSD4: Development Boundaries and the Open Countryside.....	E13
E.3.5	Policy PSD5: Green Belt and Safeguarded Land.....	E15
E.3.6	Policy PSD6: Health and Wellbeing	E17
E.3.7	Policy PSD7: Design	E18
E.4	Climate and Renewable Energy	E21
E.4.1	Policy CRE1: Climate Change.....	E21
E.4.2	Policy CRE2: Renewable Energy	E23
E.5	Housing	E25
E.5.1	Policy HOU1: Affordable Housing	E25
E.5.2	Policy HOU2: Housing Mix, Density and Standards.....	E27
E.5.3	Policy HOU3: Gypsy, Travellers and Travelling Showpeople	E28
E.6	Employment	E30
E.6.1	Policy EMP1: Employment	E30
E.7	Retail.....	E32
E.7.1	Policy RET1: Retail	E32
E.8	Infrastructure and Transport	E34
E.8.1	Policy IN1: Infrastructure.....	E34
E.8.2	Policy IN2: Transport and Accessibility.....	E35
E.9	Sustainable Environment.....	E37
E.9.1	Policy SE1: Pollution, Contamination and Amenity	E37
E.9.2	Policy SE2: Flood Risk, Water Resources and Management	E39
E.9.3	Policy SE3: Water Resources and Water Quality.....	E41
E.9.4	Policy SE4: Open Space, Sports and Leisure Provision	E42
E.9.5	Policy SE5: Biodiversity and Geodiversity	E43
E.9.6	Policy SE6: Historic Environment	E45
E.9.7	Policy SE7: Landscape.....	E46

E.1 Overview

E.1.1 Introduction

- E.1.1.1 This appendix provides an assessment of the proposed Vision, Strategic Objectives and 23 draft policies proposed by NuLBC for the emerging Local Plan.
- E.1.1.2 In light of the Government's intention to make changes to the planning system through the Levelling Up and Regeneration Bill (LURB)¹ and proposed updates to the NPPF, and the implications of this for local plan making, the Council has decided to present a focused set of local planning policies at this stage. Later stages of the plan making process will “*build out policies on several development management matters such as, for example, self and custom build, community facilities, amenity policies*”.
- E.1.1.3 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.
- E.1.1.4 For ease of reference the scoring system is summarised in **Table E.1.1** below.

Table E.1.1: Presenting likely impacts

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 a negligible effect on the 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.	--

- E.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.
- E.1.1.6 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. At the Publication stage, the Regulation 19 SA Report (SEA

¹ UK Parliament (2023) Levelling Up and Regeneration Bill. Available at: <https://bills.parliament.uk/bills/3155> [Date accessed: 05/05/23]

Environmental Report) will consider the residual impacts of the Local Plan and the overall mitigating effects of all policies.

- E.1.1.7 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 18th May 2023. 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 Draft Plan.

E.1.2 Overview of policy assessments

- E.1.2.1 The impact matrices for all policy assessments are presented in **Table E.1.2**. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table E.1.2: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
Draft Policy	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	+	+	+	0	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
HOU3	0	0	0	0	0	0	0	0	0	+	+	0
EMP1	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++
RET1	0	0	0	0	0	0	0	+	+	+	+	+
IN1	+	0	+	+	+	+	0	0	+	+	+	0
IN2	+	+	0	0	0	+	0	+	+	+	++	+
SE1	+	+	+	+	0	+	0	+	+	+	+	0
SE2	+	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
SE6	0	0	0	0	0	0	++	+	0	0	0	+
SE7	+	0	+	0	+	+	+	++	+	0	0	0

E.2 Vision and Objectives

E.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. We will have supported the growth of businesses, town centres and our University, whilst preserving and enhancing our natural environment and reduce our carbon footprint. 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	+/-	+/-	+	+	+	+	+	++	+/-	++	+/-	++

- E.2.1.1 The proposed Vision for the borough of 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.
- E.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).
- E.2.1.3 Preserving and enhancing Newcastle's natural and built assets, whilst ensuring that new development respects and improves the character and distinctiveness of the borough, would be likely to result in a major positive impact on landscape (SA Objective 8). Cultural heritage will also benefit; consequently a minor positive impact is identified for SA Objective 7. This aspiration for the natural environment should also 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.
- E.2.1.4 Although the Vision aims at 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 how the carbon footprint reduction and air quality improvement measures are going to be addressed in the local plan. Similarly, the impact on Health and Wellbeing (SA Objective 9) and Transport and Accessibility (SA Objective 10) cannot be determined. Wordings to showcase potential positive intentions on these aspects could be incorporated in the Vision.
- E.2.1.5 It is also recommended that the word "*conserve*" rather than "*preserve*" is used with regard to cultural heritage, reflecting the wording in the NPPF.

E.2.2 Strategic Objectives

Strategic Objectives

- SO-I** Create development with a sense of place and character, which naturally enhance human health through utilising sustainable construction methods and sustainable transport connections, where possible.
- SO-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-III** Further investment in the regeneration 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 vibrant centres. To support visitors and residents access to healthier food choices and accessible, sustainable green spaces and active travel options to support health and wellbeing.
- SO-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, where this is viable and deliverable.
- SO-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 and adaptable.
- SO-VI** Support the vitality of rural villages, preserving and enhancing the special character which is valuable to each local community whilst enabling balanced growth to improve affordability and to provide choice in housing types for local people.
- SO-VII** Support active and sustainable travel. Raise the profile of Kidsgrove railway station and improve the connectivity to Kidsgrove town centre as a significant sustainable transport hub in the Borough.
- SO-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-IX** Support 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.
- SO-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-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.
- SO-XII** Protect the Green Belt, except where exceptional circumstances justify strategic Green Belt release. To meet strategic needs identified by the Plan.

	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	++	+	+	+	+	+	+	++	++	++	++	++

E.2.2.1 The Council have proposed a set of 12 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.

E.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 would be expected to set out a strong framework for the conservation and enhancement of the landscape, with a major positive impact identified under SA Objective 8.
- E.2.2.3 The focus on conserving and enhancing the character of the borough's towns and villages could potentially lead to a minor positive impact on cultural heritage (SA Objective 7), although 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.
- E.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 would therefore be expected.
- E.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).
- E.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 is provided including affordable homes. A major positive impact on equality would be expected (SA Objective 10).
- E.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).
- E.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. These measures would 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).
- E.2.2.9 Conserving and enhancing green corridors, as advocated 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.

- E.2.2.10 SO-VIII refers to the preparation of lower-tier Neighbourhood Plans to guide development at the local level via a suite of detailed development management policies. This objective would be likely to benefit a range of SA Objectives.

E.3 Planning for Sustainable Development

E.3.1 Policy PSD1: Overall Development Strategy

Policy PSD1: Overall Development Strategy

1. A minimum of 7,160 dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 358 dwellings per annum.
2. Provision will be made for a minimum of 69 hectares of employment land to support the local economy. The existing employment land supply of around 50 hectares will be allocated to secure its future use.
3. Provision will be made through the Plan for (a) strategic employment site(s) to ensure a resilient supply of employment land to support investment and growth, including in the wider sub-regional economy.
4. The council will make sufficient provision for housing, employment, and other uses and seek to deliver sustainable development within the Borough by supporting the development of sites allocated in section 15 of the Local Plan and identified on the draft Policies Map.

	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	--	-	+/-	--	+/-	+/-	+/-	+/-	-	++	-	++

- E.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.
- E.3.1.2 It should be noted that the preferred sites for allocation, for residential, employment or mixed uses, have been assessed individually as part of the reasonable alternative site assessments (see **Appendix D**). The assessment of sites has identified a range of sustainability impacts in regard to SA Objectives 3, 5, 6, 7 and 8 depending on the specific locations; therefore, for the purposes of this policy assessment, the overall impact recorded under these objectives is uncertain.
- E.3.1.3 Policy PSD1 seeks to deliver a minimum of 7,160 dwellings (358 dwellings per annum) which would be expected to meet the identified local need as identified in the Housing and Economic Needs Assessment (HENA)²; therefore, the policy would be expected to result in a major positive impact on housing provision (SA Objective 10).
- E.3.1.4 Through delivering a minimum of 69ha of employment land, this would be expected to meet the upper end of the identified local need according to the HENA, leading to a major positive impact on the economy and employment opportunities (SA Objective 12).

² Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023

- E.3.1.5 Evidence included in the Housing and Economic Needs Assessment indicates that the level of housing growth proposed in Policy PSD1 is aligned with the anticipated level of jobs growth.
- E.3.1.6 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. This would, in turn, result in the loss of ecologically, and potentially agriculturally, important soils. Therefore, a major negative impact on natural resources would be anticipated (SA Objective 4).
- E.3.1.7 The proposed development of 7,160 dwellings over the plan period could lead to an increase in the local population by approximately 15,312 residents, based on an average of 2.1 people per dwelling³. Such an increase would 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 four existing AQMAs within the borough and the adjacent Stoke-on-Trent AQMA. A minor negative impact would be expected for air, health and transport (SA Objectives 2, 9 and 11).
- E.3.1.8 The total carbon emission estimates across Newcastle-under-Lyme for 2020 indicate a total of 619,200 tonnes of CO₂, with an average per capita emission of 4.8 tonnes, of which 491,300 tonnes (3.8 tonnes per capita) is considered to be within the scope of influence of the local authority⁴⁵. The construction and occupation of new dwellings, employment sites and supporting infrastructure would 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 would be anticipated as a result of the proposed development (SA Objective 1).

E.3.2 Policy PSD2: Settlement Hierarchy

Policy PSD2: Settlement Hierarchy

Strategic Centre

Newcastle-under-Lyme forms the strategic centre of the borough and contains the greatest 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 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

³ Calculated based on the dwelling stock (57,657) derived from DLUHC & MHLCG (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: 10/05/23]

⁴ Department for Business, Energy and Industrial Strategy (2022) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2020. Available at: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics> [Date accessed: 10/05/23]

⁵ CO₂ emissions estimates within the scope of influence of Local Authorities refers to subset dataset (excludes large industrial sites, railways, motorways and land-use).

Policy PSD2: Settlement Hierarchy

resources and infrastructure to allow jobs, homes and other facilities to be located close to each other and be accessible by public transport.

Urban Centre

Kidsgrove forms an urban centre in the borough. The centre performs a secondary, but complementary role to the 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. 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. 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. 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.

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 to 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 is a range amongst these villages in terms of size and 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)

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 diversification, where justified. Areas of landscape value, sites of nature conservation importance and heritage assets and their settings will have been maintained and 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	+	-	-	-	-	-	-	-	+	++	+	++

- E.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 would be appropriate in each.
- E.3.2.2 Under this policy, development would 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.
- E.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 of 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).

- E.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 would 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 would 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 would 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).
- E.3.2.5 However, an increase in the population within the urban areas of the borough would 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. Four 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. This is because of higher pollution emissions due to human activity in densely populated street canyons, in-combination with taller buildings stagnating the air flow. By focusing development in existing urban areas, it is likely that current air quality issues would be exacerbated, and therefore, a minor negative impact on air pollution would be expected (SA Objective 2).
- E.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 would 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 would 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 would be likely (SA Objective 4).
- E.3.2.7 Due to pressures on land for development, there could potentially be adverse effects on the local GI network. Higher density developments and the regeneration of vacant sites within the higher-tier settlements would 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 would 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 would be anticipated (SA Objective 3). A similar adverse impact could also extend to the borough's water resources (SA Objective 6).

- E.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 would 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).
- E.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 would 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.
- E.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, and 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).
- E.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 would be 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).

E.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 4,800 new homes
2. The urban centre of Kidsgrove is expected to accommodate in the order 900 new homes
3. The rural centres are expected to accommodate development as shown below:-
 - a. Audley and Bignall End (joint): in the order of 250 new homes
 - b. Betley & Wrinehill (joint) and Madeley & Madeley Heath (joint): in the order of 200 new homes
 - c. Loggerheads: in the order of 500 new homes
 - d. Keele and Keele University (joint): in the order of 600 new homes

	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	+	-	-	-	-	-	-	-	+	++	+	++

E.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 and Madeley/Madeley Heath.

E.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 in terms of the SA Objectives.

E.3.4 Policy PSD4: Development Boundaries and the Open Countryside

Policy PSD4: Development Boundaries and the Open Countryside

1. Development boundaries for the Strategic Centre, Urban Centre and Rural Centres are defined on the draft policies map. Outside of these centres, Other Settlement Village Boundaries are also identified and defined on the draft Policies Map. Open countryside is defined as land outside of the development or Other Settlement Village Boundary.
2. Within Development or Other Settlement Village 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. The Council will encourage the redevelopment / re-use of previously developed land and buildings when proposals do not conflict with other relevant Local Plan policies.
4. In the open countryside, the following types of development will be supported:-
 - a. Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations
 - b. Development associated with the essential expansion or redevelopment of an existing business
 - c. Development associated with the conservation and enhancement of a heritage asset
 - d. For limited extensions that would not adversely affect the form, scale, massing or proportion of the building
 - e. Re-use of existing rural buildings where the building is of permanent and substantial construction and would not require extensive alteration, rebuilding or extension. The building should be structurally capable of being converted for the proposed use
 - f. Replacement existing inhabited dwellings whereby the new building is not materially larger than that of the building it is proposed to replace
 - g. The infill of a small gap with one or two dwellings in an otherwise built-up frontage
 - h. Where the development meets a demonstrable local housing need such as affordable housing and / or self-build plots⁶
 - i. In the case of new dwellings which meets 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.

⁶ Where an application is for Self-Build, the site must be directly adjacent to the development boundary and other residential development.

Policy PSD4: Development Boundaries and the Open Countryside

5. 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.
6. Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land 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.

	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	+

- E.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.
- E.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 would help to protect existing soils and vegetation within the open countryside areas. The policy also supports the re-use of existing buildings, and seeks to ensure that any proposals for replacement dwellings are *“not materially larger than that of the building it is proposed to replace”*. New dwellings would 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).
- E.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).
- E.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).
- E.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 would 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).

E.3.5 Policy PSD5: Green Belt and Safeguarded Land

Policy PSD5: Green Belt and Safeguarded Land

1. The Green Belt boundary is defined on the draft Policies Map.
2. The Green Belt boundary will be altered through this Plan to
 - a. Support the allocation of the Green Belt sites listed in section 15 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 National Planning Policy Framework.
4. The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is one of the exceptions listed within national planning policy.
5. Certain other forms of development are also considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in the National Planning Policy Framework.
6. Development proposals for sites removed from the Green Belt and allocated or safeguarded in this plan 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.
7. The Plan, at Regulation 19 stage, will consider whether it is necessary to identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan period. If land is identified as safeguarded land, it is not allocated for development at the present time. Planning permission would only be granted following an update to a Plan which proposes 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
PSD5	+/-	+/-	0	-	+/-	+/-	+/-	+/-	0	+	0	+

E.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.

E.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.

E.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 D**). 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.

E.3.5.4 By protecting the retained Green Belt, the policy would be likely to help maintain its openness and permanence, which would serve to prevent coalescence between settlements and help to prevent inappropriate development, such as large-scale residential development, in these locations. As such, the policy 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.

E.3.5.5 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 would be expected with an associated minor negative impact on SA Objective 4.

E.3.5.6 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”*. PPG suggests that such compensatory improvements should be informed by supporting evidence with regard to landscape, biodiversity and recreational enhancements, potentially including⁷:

- *“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”*.

E.3.5.7 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, and could potentially provide opportunities to deliver or contribute towards

⁷ 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: 11/05/23]

the emerging Nature Recovery Network⁸ and/or Green Infrastructure Network⁹. 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.

E.3.5.8 The overall impact on the remaining SA Objectives (1, 2, 5, 6, 7 and 8) are identified as uncertain at this stage.

E.3.6 Policy PSD6: Health and Wellbeing

Policy PSD6: Health and Wellbeing

The Council will support development that fosters safe, healthy, fulfilling and active lifestyles that:-

1. Supports public health initiatives and encourages healthy lifestyles and environments to tackle health inequalities and:
 - a. Is supported by a rapid health impact assessments (HIA) as part of the application process on all major development proposals. This will include a review of the potential health impacts of a policy or proposal. Following the screening assessment, a full health impact assessment may be required.
 - b. For housing developments, achieves Building for a healthy Life Standard (or as updated).
 - c. Provides opportunities for healthy living and promote mental wellbeing through the encouragement of safe and accessible walking and cycling, good housing design (including the minimisation of social isolation and creation of inclusive communities) and access to services.
 - d. Does not result in the unnecessary loss of open spaces identified in the Open Space Strategy
 - e. Provides appropriate access to sports facilities and opportunity for recreation and leisure
 - f. Supports schemes that encourage life-long learning and skills training
 - g. Supports initiatives that seek to reduce obesity across the borough, including for schemes that require planning permission by
 - i. Ensuring hot food takeaways within 400 metres of a primary or secondary school are not open to the public before 17:00 on weekdays and there is no over the counter sales before that time
 - ii. Reducing the clustering of hot food takeaways by ensuring that no more than 2 hot food takeaways are located adjacent to each other in the town centres of Newcastle-under-Lyme and Kidsgrove
 - iii. Ensuring any proposals for hot food takeaways are subject to a full health impact assessment, at the cost of the developer.

	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

⁸ 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?qclid=EAlaIqobChMI7Oja5-iY_gIVquitCh3fTQgkEAAAYASAAEgJuQ_D_BwE [Date accessed: 03/05/23]

⁹ 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: 25/04/23]

- E.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.
- E.3.6.2 In line with the Staffordshire Joint Wellbeing Strategy¹⁰, the policy aims to address the four priorities for health for 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.
- E.3.6.3 The policy requires a Rapid 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 would be likely to ensure potential adverse effects of development on human health and health inequalities are identified and addressed.
- E.3.6.4 Furthermore, the policy 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. The policy would be 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 would be 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).
- E.3.6.5 Through promoting accessible services and active travel connections, the policy would 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.
- E.3.6.6 Overall, Policy PSD6 would be likely to result in a major positive impact on health and wellbeing and equality (SA Objectives 9 and 10).

E.3.7 Policy PSD7: Design

Policy PSD7: Design

1. Development proposals should accord with the National Design Code, National Design Guide and any 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

¹⁰ 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: 11/05/23]

Policy PSD7: Design

3. Development proposals for major development schemes should demonstrate that design proposals have positively responded to the Design Review process
4. Development proposals should ensure that housing developments achieve Building for a Healthy life standard (or as updated)
5. 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 the risk of crime. Design should take into account Secured by Design Principles
6. 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.
7. 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.

	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

E.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.

E.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.

E.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 toolkit¹¹. 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;

¹¹ 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: 11/05/23]

- Cycle and car parking;
- Green and blue infrastructure; and
- Back of pavement, front of home.

- E.3.7.4 The measures set out in the policy would be 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 would be expected (SA Objective 8). A minor positive impact could potentially extend to cultural heritage (SA Objective 7) since, under this policy, new development would be expected to conserve and possibly enhance the local character including that of heritage assets and the historic environment.
- E.3.7.5 In line with the BHL considerations, Policy PSD7 would be 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 would be expected to result in a minor positive impact on health and accessibility (SA Objectives 9 and 11).
- E.3.7.6 Furthermore, improved provision and connectivity of green/blue infrastructure would be likely to contribute towards climate change resilience. Green/blue infrastructure can provide several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants 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).
- E.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 would be likely to help reduce crime and the fear of crime. Therefore, the policy would be 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).

E.4 Climate and Renewable Energy

E.4.1 Policy CRE1: Climate Change

Policy CRE1: Climate Change

1. The Council expects development to follow the energy hierarchy and seek to achieve a high rating under schemes such as BREEAM and Building for a Healthy Life (or as updated).
2. To ensure a high standard of fabric and energy efficiency performance, all new development will be expected to exceed the carbon emission targets set by UK Building Regulations (Part L of the Building Regulations or as amended / updated)
3. All residential development proposals should seek to reduce the use of mains water through adoption of water saving measures (e.g. smart meters), 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. Non domestic developments should be designed to meet the BREEAM 'excellent' standards on water efficiency, unless demonstrated as not feasible or viable. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM 'Very Good' standard must be met as a minimum.
4. 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.
5. 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.
6. Opportunities for extensions to the district heat network at Keele 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.
7. Development proposals should include green spaces and tree planting measures (including maintenance) that will improve the environment through carbon capture.
8. Schemes that help to deliver the Council's 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
CRE1	++	+	+	++	+	+	0	+	+	+	0	0

- E.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.
- E.4.1.2 Under this policy, all new development would need to demonstrate an exceedance of the carbon emission targets as set out in the Building Regulations Part L¹², 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 are also encouraged.
- E.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).
- E.4.1.4 By promoting energy efficient and resilient building design, as well as encouraging opportunities for expanding the district heat network at Keele, the policy would 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 would be likely to have benefits for mental and physical wellbeing as well as equality (SA Objectives 9 and 10).
- E.4.1.5 More efficient use of energy and natural resources would 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).
- E.4.1.6 Policy CRE1 would 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 would be reduced. A minor positive impact on water resources would be expected (SA Objective 6).
- E.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 would also be expected to help deliver benefits to fluvial and surface water flood risk through providing natural flood storage and drainage and reducing water runoff rates, leading to a minor positive impact on flooding (SA Objective 5).
- E.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

¹² 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: 11/05/23]

(SA Objective 3). Enhanced green/blue infrastructure could also help to improve the local landscape character, to some extent (SA Objective 8).

E.4.1.9 Overall, a major positive impact on climate change would be expected (SA Objective 1).

E.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 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 matters 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
 - 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 its visual impact, whilst ensuring public safety.
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 before greenfield development.
 - b. Avoid the loss of best and most versatile land
 - c. Maximise efficiency through panel orientation
 - d. Be supported by a glint and glare assessment, where necessary
8. 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.
9. For wind energy proposals, potential opportunity areas suitable in principle for wind energy development are shown on the draft 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 backing.

	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

- E.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.
- E.4.2.2 The use and generation of renewable energy would 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), would be required to provide for at least 10% of their energy needs from renewable or low carbon energy sources, unless it can be demonstrated that this is not feasible or viable. The encouragement of these schemes under Policy CRE2 would 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).
- E.4.2.3 In addition, the promotion of alternative renewable and low carbon technologies would be likely to result in reduced emission of pollutants. This would be expected to have a minor positive impact on air quality in the plan area (SA Objective 2).
- E.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).
- E.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 would be 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 would need to be assessed on a case-by-case basis.

E.5 Housing

E.5.1 Policy HOU1: Affordable Housing

Policy HOU1: Affordable Housing

1. In residential development¹³ affordable housing¹⁴ will be provided as follows:-
 - a. For major residential developments of greenfield sites, 30% of all units are to be affordable
 - b. For major residential developments of brownfield sites in the low value zone as shown on the draft Policies Map, 15% of all units are to be affordable
 - c. For major residential developments of brownfield sites in the high value zone as shown on the draft Policies Map, 25% of all units are to be affordable
2. The size and type of affordable dwellings to be provided¹⁵ will be dependent on recognised local housing need (including the need of older residents and residents with disabilities) and confirmed with the Council's Housing Team prior to application determination, and will generally comprise: 25% to be delivered as First Homes, 65% to be delivered as social rented; and 10% delivered as other forms of affordable housing. In line with national policy, at least 25% should be first homes and at least 10% available for affordable home ownership.
3. Affordable housing is required to be provided on site, however, in exceptional circumstances where it can be proven that on site delivery is not possible, 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.
4. Secure arrangements are required to ensure that the affordable housing provided in accordance with this policy will remain affordable in perpetuity (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 connection¹⁶
5. Where it has been demonstrated with robust justification 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. The on-site delivery of affordable housing should see a fair dispersal throughout a development, achieving high-quality design, and be indistinguishable from market dwellings unless specific circumstance suggests clustering and/or a distinctive design is appropriate
7. In regards to Rural Exception Sites and Entry Level/First Homes Exceptions Sites, the development of affordable housing will be permitted on small sites¹⁷ as an exception to other policies concerning the countryside, to meet locally identified affordable housing need, subject to all of the following criteria being met:
 - a. Sites should adjoin rural centres development boundaries or 'village envelopes' in 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. There is a proven and as yet unmet local need, having regard to the latest Housing Needs Assessment and other local data, e.g. a 'made' Neighbourhood Plan;
 - c. No other suitable and available sites exist within the Development Boundary of the village or rural centre;

¹³ In this policy, residential development is taken to mean development within Use Class C3, as defined in the Town and Country Planning (use classes) order 1987, as amended.

¹⁴ As defined in the glossary and Annex 2 of the NPPF

¹⁵ including conversions and sub-divisions, above the thresholds set out within this policy

¹⁶ In line with the Council's Local Connection policy

¹⁷ in the context of Exception sites, 'small' is defined as a site which should not exceed whichever is the lesser of 5% of the number of dwellings within the main built-up area of the village or 1 hectare.

Policy HOU1: Affordable Housing

- d. Secure arrangements exist to ensure the housing will remain affordable and available to meet the continuing needs of local people in perpetuity;
- e. 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 in line with the definition of a small site;
- f. Where viability for 100% affordable housing provision cannot be achieved, an element of market housing¹⁸ may be included within a Rural Exception and Entry Level/First Home scheme to provide sufficient cross-subsidy to facilitate the delivery of affordable homes. 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;
- g. Where local evidence suggests that a significant local need exists for one or more other forms of affordable housing on a proposed Entry Level/First Homes Exception Site, applicants may alter the proportions of affordable housing to include small quantities (up to 25%) of other affordable housing products¹⁹
- h. Entry Level/First Homes Exception Sites are not permitted within the Green Belt. The Written Ministerial Statement and the NPPG are clear that in these Green Belt locations, only Rural Exception Sites can be brought forward for affordable housing on unallocated sites beyond the development 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
HOU1	0	0	0	0	0	0	0	+	+	+	0	0

- E.5.1.1 Policy HOU1 would help to ensure that the Local Plan delivers an appropriate mix and distribution of affordable housing that meets the varied needs of current and future residents of the borough.
- E.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 would help to ensure that there is an appropriate mix of affordable homes, including first homes and socially rented housing, dependent on the locally identified housing needs. A minor positive impact on equality and housing provision would be expected (SA Objective 10).
- E.5.1.3 Through seeking to meet the needs of the local population, including for older residents and those with special housing needs, the policy would help to ensure that people can live comfortably and safely in appropriate and affordable housing. As such, the policy would potentially have a minor positive impact on human health (SA Objective 9).
- E.5.1.4 The policy promotes high-quality design and states that affordable homes should be “*indistinguishable from market dwellings*”, suggesting that new developments would be in-

¹⁸ Maximum proportion of market homes is 20% of the overall number of units on the site where this is proven essential to the delivery of the Rural Exception site/First Home Exception site.

¹⁹ Applicants will be expected to provide evidence of this need in the form of a Local Housing Needs Assessment, local authority Housing Register, or other sufficiently rigorous local evidence

keeping with the existing character of the neighbourhoods. A minor positive impact on the local landscape could be achieved (SA Objective 8).

E.5.2 Policy HOU2: Housing Mix, Density and Standards

Policy HOU2: Housing Mix, Density and Standards

1. Residential development proposals will generally be expected to achieve the following net densities;
 - a. On sites within the Strategic Centre, development should achieve a net density of around 40-50 dwellings per hectare;
 - b. On sites within the Urban Centre, development should achieve a net density of around 40 dwellings per hectare;
 - c. On sites within Rural Centres, development should achieve a net density of around 20-30 dwellings per hectare;
 - d. In accordance with the densities prescribed in adopted Neighbourhood Plans, where appropriate.
2. The form and density of housing will vary across development sites and respond to sensitive locations such as Conservation Areas, Listed Buildings, areas of flooding or archaeological interest or ecological / biodiversity value. Design and density of schemes should reflect the sensitivity and the unique characteristics of different areas. Development densities immediately adjacent to such areas should be adjusted downwards as appropriate to ensure that impact on them is minimised
3. All major residential development sites, having regard to location and site size, should contain a mix of types and sizes of market housing which should also include housing suitable for the needs of older people. The mix will be informed by the most up-to-date evidence comprising Housing Need Assessments (HNA) / Strategic Housing Market Assessment (SHMA) and, where available, by other local data; this could include housing registers, Neighbourhood Plans, parish surveys, parish plans, or the latest council position statements. The current evidence suggests a market housing mix, comprising of (and is subject to change on the basis of updated evidence):-
 - a. 40% as 1-2 bed dwellings;²⁰
 - b. 45% as 3 bed dwellings;
 - c. 15% as 4 or more bed dwellings;
 - d. In terms of the type of housing, 75-80% as houses and 20-25% evenly split as bungalows and flatted units.
4. Proposals for new residential development in the Borough should meet the Nationally Described Space Standard.
5. All new dwellings should meet the requirements of Building Regulations Part M4(2) dwelling standard (Accessible and Adaptable Dwellings).
6. On major residential developments and specialist housing for older people, 10% of the dwellings should also meet the requirements of Building Regulations Part M4(3)(2)(a) wheelchair adaptable dwellings
7. Where housing for older people or people with special needs falling into Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) is proposed, permission will be supported provided that:
 - a. There is an evidenced requirement for that type of accommodation;
 - b. It is designed to meet the particular requirements of residents with a particular focus on social, physical, mental and / or health care needs; and
 - c. The scheme has good access to public transport, healthcare, shopping and other community facilities for its residents, their visitors and on-site workers.

²⁰ 1 bed units should be provided as flatted 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
HOU2	0	0	0	0	0	0	0	+	+	+	0	0

- E.5.2.1 Policy HOU2 aims to ensure that the Local Plan delivers an appropriate density and mix of housing to help to ensure that the varied needs of current and future residents are met, whilst responding to the local characteristics and sensitivities.
- E.5.2.2 By providing a suitable mix of housing types and tenure, in line with the locally identified needs, this policy would 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).
- E.5.2.3 The policy supports the development of housing for older people or people with special needs, including wheelchair users, and would ensure that all new dwellings meet the requirements of Building Regulations Part M4(2) dwelling standard (Accessible and Adaptable Dwellings). By seeking to meet the needs of the population, a minor positive impact on health and wellbeing would be likely (SA Objective 9).
- E.5.2.4 Through seeking to ensure that the “*design and density of schemes should reflect the sensitivity and the unique characteristics of different areas*”, the policy could potentially help to conserve the local landscape character and ensure new developments are in keeping with local distinctiveness, leading to a minor positive impact on SA Objective 8.
- E.5.2.5 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*”, which could help to minimise the potential for adverse effects on biodiversity, flooding and cultural heritage (SA Objectives 3, 5 and 7).

E.5.3 Policy HOU3: Gypsy, Travellers and Travelling Showpeople

Policy HOU3: Gypsy, Travellers and Travelling Showpeople

- Sites will be approved to meet the needs set out in the most recent Gypsy and Traveller Accommodation Needs Assessment (GTAA).
- Gypsy and Traveller and Travelling Showperson sites should make sure that they:-
 - Respect the scale of, and do not dominate the nearest settled community when located in rural areas;
 - Avoid placing an undue pressure on the local infrastructure, highways, and services;
 - Are well planned, including clearly marked site and pitch / plot boundaries and appropriate boundary treatment;
 - Provide a safe environment for intended occupants through access, layout, design, and lighting;
 - Provide adequate space for parking, turning and servicing;
 - Provide for an appropriate level of essential services and utilities to service the site;
 - Make provision for waste to be stored appropriately for disposal and be collected in an efficient manner.
- Alongside the 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.

Policy HOU3: Gypsy, Travellers and Travelling Showpeople

The proposal should be located within reasonable travelling distance to 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, unless suitable replacement provision of equal or enhanced value are provided. Opportunities for the intensification and extension of existing 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
HOU3	0	0	0	0	0	0	0	0	0	+	+	0

- E.5.3.1 In accordance with the Planning policy for traveller sites²¹, 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”*.
- E.5.3.2 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 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”*²².
- E.5.3.3 Policy HOU3 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 would be likely (SA Objective 10).
- E.5.3.4 In line with the policy, development proposals should be located *“within reasonable travelling distance to 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).
- E.5.3.5 The policy sets out criteria to ensure that future development proposals for pitches/plots would not result in significant adverse effects on the local landscape and highways and that adequate space and utilities infrastructure is provided.

²¹ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 12/05/23]

²² Ibid

E.6 Employment

E.6.1 Policy EMP1: Employment

Policy EMP1: Employment

1. The sites highlighted in Appendix 2 will be utilised to contribute to the supply of employment land in accordance with Policy PSD:1. Consideration will also be given to allocating a new strategic employment site(s) to ensure delivery of the qualitative and quantitative employment land requirements for this Plan period.
2. A proposal for the expansion, intensification, upgrading or redevelopment of an existing employment site for employment uses or uses that would contribute to the improvement of the physical appearance of existing employment sites or premises will be supported provided that adverse environmental and amenity impacts are avoided or minimised to an acceptable level.
3. The proposed use must be compatible with adjacent land uses and not prejudice the operation, viability or future development of other businesses.
4. Within the employment areas (& subject to site-specific criteria to be established at Regulation 19 of the Local Plan), proposals for development in use class E(g)), B2 and B8 will be supported in principle.
5. Existing premises and land or floorspace which is used, or was last used, for employment uses (including those outside identified employment areas) will be protected, unless it can be satisfactorily demonstrated that the site (or part of the site) or premises is genuinely redundant and is unlikely to be re-used for employment uses within the Plan period, having regard to the following factors:
 - a) The primary focus is to protect existing employment uses (particularly those with good access to and from the strategic road network and those with positive attributes of topography & ground conditions), however, greater flexibility will be given to other employment generating uses (such as ancillary operations) which cannot reasonably be located elsewhere;
 - b) If the introduction of any non-employment uses will not negatively impact on the operation of the remaining or neighbouring uses;
 - c) If the site, with or without adaptation, would not be capable of accommodating an acceptable employment development;
 - d) If no effective demand exists or is likely to exist in the future to use the land or buildings for employment use. Consideration should include the length of time the property has remained vacant, the attempts made to sell/let it and the demand for the size and type of employment premises in the area;
 - e) If the loss of a small proportion of floorspace would lead to a significant upgrade of the remaining employment floorspace; and
 - f) If the existing use conflicts with neighbouring uses.
6. 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.

	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	+/-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	+	+	++

E.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 protect existing employment land, and supports proposals for the expansion, intensification or redevelopment of employment sites where this would not compromise other objectives of the Local Plan. Overall, a major positive impact on the local economy would be expected (SA Objective 12).

E.6.1.2 The provision of new employment land within existing employment areas would help to ensure that there are generally good levels of accessibility to employment opportunities,

with existing transport links in these areas. A minor positive impact on equality and accessibility, in terms of access to jobs, could be achieved (SA Objectives 10 and 11).

- E.6.1.3 At this stage, the Draft Plan includes a suite of preferred sites for allocation for employment uses which are cross-referenced in this policy text. It should be noted that the preferred sites for allocation, including those for employment or mixed uses, have been assessed individually as part of the reasonable alternative site assessments (see **Appendix D**). The assessment of sites has identified 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 is uncertain.
- E.6.1.4 Nevertheless, the development of new employment sites would be expected to result in the loss of previously undeveloped land to some extent and result in the loss of soil resources. Therefore, this policy would be likely to result in a minor negative impact on the Plan area's natural resources (SA Objective 4).

E.7 Retail

E.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, the following retail hierarchy of centres should be followed:-

Role and tier in settlement hierarchy	Centre Name	Centre(s)
Strategic Centre	Strategic Town Centre	Newcastle-under-Lyme Town Centre
Urban Centre	Urban Town Centre	Kidsgrove Town Centre
Rural Centre	Rural Centre	Loggerheads (Eccleshall Road), Madeley (Newcastle Road), Baldwin's Gate (Newcastle Road) and Audley (Church Street)
	District Centres	Chesterton (London Road), Silverdale High Street and Wolstanton High Street
	Neighbourhood Centres	Bradwell (Hanbridge Avenue), Butt Lane (Congleton Road), Chesterton (Barbridge Road), Clayton (Cambridge Drive), Clayton (Clayton Road, opposite Abbot's Way), Cross Heath (Liverpool Road), Knutton (Knutton Lane), May Bank (High Street), Rookery (High Street), Newcastle Town (George Street, Eastern End), Parkside (Bath Road), Porthill (Watlands View), Seabridge (Tyne Way), Talke (High Street), Thisteberry (Paris Avenue), Thisteberry / Town (Higherland / Drayton Street), Westlands (Windermere Road), Westbury Park (Westbury Road).

2. Development proposals should reflect the role, function, and character of each centre in the retail hierarchy.
3. Town Centre and Primary Shopping Area boundaries for the Strategic Centre and Urban Centre are shown on the Policies Map.
4. Development proposals for use class E(a) retail development or investment to enhance existing use class E(a) retail provision will be supported within the Primary Shopping Area and Rural, District and Neighbourhood Centres.
5. 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.
6. 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:-
 - a. The proposal provides a gross floorspace in excess of 500 sqm gross: or
 - b. The proposal is located within 800 meters of the boundary of a district, rural or neighbourhood centre and is in excess of 200 sqm gross.
7. Retail convenience and comparison floorspace needed 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	+	+	+	+	+

- E.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.
- E.7.1.2 The policy promotes retail uses in appropriate areas, within the defined centres, and would resist large scale developments for retail or leisure uses outside of these areas. In doing so, the policy could help to ensure good levels of accessibility as the bulk of the new development would 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 including confirmation that the policy will ensure that permitted retail/leisure developments outside of the defined centres are accessible via public transport and active travel links.
- E.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).
- E.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 would 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 minor positive impact on the local economy (SA Objective 12) as well as the landscape/townscape character (SA Objective 8).

E.8 Infrastructure and Transport

E.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 financial contribution through Community Infrastructure Levy (CIL) regulations 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. Development should have regard to the latest Infrastructure Delivery Plan (IDP). The areas potentially subject to direct provision and / or contributions include but are not limited to:
 - a. Affordable housing;
 - b. Highway and transport infrastructure including sustainable transport measures;
 - c. Flood prevention and surface water drainage including future maintenance;
 - d. Green infrastructure, including future maintenance;
 - e. Education;
 - f. Health care provision;
 - g. Biodiversity net gain
5. Where appropriate, developments will be required to incorporate new infrastructure onsite.
6. Where a financial contribution is 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. The overall level of contribution required will allow developments to remain viable, wherever this is compatible with securing essential works that are fundamental to the acceptability of the proposal.
7. 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.
8. 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 the planning application.
9. Developers will be required to work with appropriate providers to provide the necessary digital infrastructure to support broadband and associated infrastructure

	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	+	+	+	0

- E.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.

- E.8.1.2 Under this policy, development proposals would 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, green infrastructure and biodiversity net gain, schools and healthcare facilities. Therefore, minor positive impacts would be likely across several SA Objectives including climate change, biodiversity, waste, flooding, water, health, equality and transport (SA Objectives 1, 3, 4, 5, 6, 9, 10 and 11).

E.8.2 Policy IN2: Transport and Accessibility

Policy IN2: Transport and Accessibility

1. Development proposals which contribute towards an accessible, efficient and safe transport network that offers a range of transport choices for the movement of people and goods and improves accessibility through sustainable modes of travel will be supported. All developments should demonstrate, where appropriate, that they have had regard to the following criteria:
 - a. Located where travel can be minimised, and the use of sustainable transport modes maximised.
 - b. Minimise additional travel demand with measures such as travel planning, safe and convenient public transport and associated infrastructure, car clubs, walking and cycling links, and integration with existing infrastructure.
 - c. Make allowance for low and ultra-low emission vehicle refuelling infrastructure.
 - d. Protect, and where possible, enhance public rights of way.
 - e. Not cause unacceptable highway safety problems.
 - f. Avoid severe residual impacts on the road network, either direct and / or cumulative.
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.
 - b. Show how the proposed development will link into and enhance existing or proposed walking, cycling or public transport infrastructure.
 - c. Encourage sustainable and active travel alternatives (such as walking, cycling or public transport use).
 - d. Travel Plans prepared for major developments will be required to monitor its effectiveness.
3. Development should consider the impact of development on the wider transport network and contribute to meeting the wider transport needs generated by the impact of development in the area. Development should have regard to the Infrastructure Delivery Plan, Local Transport Plan alongside the Local Cycling and Walking Infrastructure Plan, Borough Integrated Transport Strategy for Newcastle-under-Lyme and, where necessary contribute to the delivery of proposals.
4. The Council requires all developments to consider appropriate parking provision using the following criteria:-
 - 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;
 - d. Developments consider priority parking for cycling, electric vehicles as a means of promoting their use;
 - e. Developments encourage the use of public transport, walking and cycling.
5. Developments 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.
6. 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.
7. Development proposals affecting the borough's waterways should include environmental improvements and make a positive contribution to the visual appearance of the corridor to support active travel links

	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	+	+	+	++	+

- E.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.
- E.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*” would be 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).
- E.8.2.3 The transport improvements set out in the policy including better links to Kidsgrove Station as well as walking/cycling infrastructure could also help to improve sustainable access to employment opportunities, local services, healthcare and schools. Minor positive impacts would be likely in relation to health and wellbeing, equality and the economy (SA Objectives 9, 10 and 12).
- E.8.2.4 The policy would require proposals which generate a significant amount of travel movements to be informed by a Travel Plan, which would need to demonstrate how the proposal would facilitate active and sustainable transport. Under this policy, development proposals would also need to show how they have considered the findings of relevant evidence base documents relating to travel including the Local Transport Plan and Local Cycling and Walking Infrastructure Plan.
- E.8.2.5 Several of the provisions under this policy would be likely to reduce transport associated emissions, by encouraging more sustainable options. This includes promotion 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 would be likely to have a minor positive impact on climate change and air pollution (SA Objectives 1 and 2).
- E.8.2.6 Overall, a major positive impact on transport and accessibility would be likely (SA Objective 11).

E.9 Sustainable Environment

E.9.1 Policy SE1: Pollution, Contamination and Amenity

Policy SE1: Pollution, Contamination and Amenity

1. Development proposals that are likely to result in detrimental impacts on air quality and other forms of pollution will not be permitted unless mitigation measures to reduce the impact of pollutants can be demonstrated. Development proposals must:
 - 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. Ensure that proposals are suitable and appropriate in the context of its surrounding environment and existing conditions;
 - d. Take into account the cumulative effects of emissions from proposed development alongside other and existing sources of air pollution in the vicinity;
 - e. Demonstrate that mitigation measures can be achieved to reduce pollution, both during construction and operational phases of development.
 - f. 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 Government guidance.
 - g. Ensure that any proposals where external lighting is required, a lighting scheme will be required for the security and to achieve working activities which are safe and to ensure 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.
 - h. 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 of Newcastle-under-Lyme 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 zero 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. All applications which fall 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 coal mining in the area.
4. Development on or near land that is, or may be, affected by contamination will only be permitted where:
 - a. An appropriate contaminated Land Assessment has been carried out as part of the application to identify any risks to human health, the natural environment or water quality
 - b. Where contamination is found which would pose an unacceptable risk to people's health, the natural environment or water quality, the council will impose a condition, if appropriate, to ensure the applicant undertakes a desktop study, and if required, an intrusive site investigation, remedial measures, and a validation report to ensure that the site is suitable for the proposed use and that the development can safely proceed.
 - c. Remediation works will usually be carried out prior to first occupation or use of any part of the development. Required remediation methods will be secured through a planning condition.

	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

- E.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, odour and ground contamination issues. The policy requires proposals to “*demonstrate that mitigation measures can be achieved to reduce pollution, both during construction and operational phases of development*”.
- E.9.1.2 Air pollution is a significant concern internationally and locally. The policy would 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.
- E.9.1.3 Policy SE1 further sets out the intention to improve the borough’s air quality by promoting the uptake of low and zero 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 would be 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). 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, would be likely (SA Objectives 10 and 11).
- E.9.1.4 By limiting the impacts of development on local air quality and ensuring that development proposals would not expose residents to harmful levels of air pollution, alongside promoting active travel and green infrastructure, this policy would 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.
- E.9.1.5 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would 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 green infrastructure 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).
- E.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 tranquility in rural areas, with potential for a minor positive impact on the landscape (SA Objective 8).
- E.9.1.7 This policy aims to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This would be likely to

have a minor positive impact on biodiversity, human health and pollution, including water pollution (SA Objective 6). Furthermore, the use of contaminated land for development could potentially help to reduce the amount of development on previously undeveloped land, and therefore, this policy could potentially help prevent the loss of ecologically or agriculturally valuable soil resources. This would be expected to have a minor positive impact on natural resources (SA Objective 4).

E.9.2 Policy SE2: Flood Risk, Water Resources and Management

Policy SE2: Flood Risk, Water Resources and Management

1. In order to minimise the impacts of and from all forms of flood risk a Flood Risk Assessment (FRA) is required for all development:
 - a. Within flood zones 2, 3 or 3b (as defined by the latest Environment Agency mapping);
 - b. Within flood zone 1 with a site area of 1 hectare or more or where the SFRA (Strategic Flood Risk Assessment) shows it will be at risk of flooding from a river/water course in the future
 - c. Within areas with critical drainage problems;
 - d. That increases the vulnerability classification and is in flood zone 1 where the SFRA shows it is at risk from other sources of flooding.
2. Flood risk assessments; All development proposals requiring a Flood Risk Assessment in (a) above will assess all sources and forms of flooding, must adhere to the advice in the latest version of the SFRA and will;
 - a. Provide level-for-level floodplain compensation, up to the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change, and volume-for-volume compensation unless a justified reason has been submitted and agreed which may justify other forms of compensation
 - b. Ensure no increase in flood risk on site or elsewhere, such as downstream or upstream receptors, existing development and/or adjacent land, and ensure there will be no increase in fluvial and surface water discharge rates or volumes during storm events up to and including the 1 in 100 year storm event, with an allowance for climate change (the design storm event)
 - c. Not flood from surface water up to and including the design storm event, or any surface water flooding beyond the 1 in 30 year storm event, up to and including the design storm event will be safely contained on site
 - d. Explore opportunities to reduce flood risk overall, including financial contributions from the developer where appropriate
 - e. Ensure development is safe from flooding for its lifetime (and remain operational where necessary) including an assessment of climate change impacts
 - f. ensure development is appropriately flood resistant, resilient and safe and does not damage flood defences, but does allow for the maintenance and management of flood defences
 - g. Take all sources and forms of flooding into account
 - h. Ensure safe access and exits are available for development in accordance with Department for Environment, Food and Rural Affairs (DEFRA) guidance. Access to “safe refuges” or “dry islands” are unlikely to be considered safe, as this will further burden the Emergency Service in times of flood
 - i. Include detailed modelling of any ordinary watercourses within or adjacent to the site, where appropriate, to define in detail the area at risk of flooding and model the effect of climate change
 - j. Provide an assessment of residual flood risk
 - k. Provide satisfactory Evacuation Management Plans, where necessary, including consultation with the Emergency Services and Emergency Planners
3. Sewer Flood Risk. The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs.
4. Sustainable Drainage Systems (SuDs): SuDS are designed to both manage the flood and pollution risks resulting from urban runoff and to contribute wherever possible to environmental enhancement and place making. With this in mind, the multi-functionality and multiple benefits of SuDS should always be considered. In order to minimise the impacts of and from all forms of flood risk, the following is required:

Policy SE2: Flood Risk, Water Resources and Management

- a. Ensure development layouts are informed by drainage strategies incorporating SuDS and complete site-specific ground investigations to gain a more local understanding of groundwater flood risk and inform the design of sustainable drainage components
- b. Where possible, design and use sustainable drainage systems (SuDS) for the effective management of surface water run-off on site, as part of the submitted planning application and not increase flood risk elsewhere, including sewer flooding.
- c. Where site-specific Flood Risk Assessments are required in association with development proposals, they should be used to determine how SuDS can be used on particular sites and to design appropriate systems
- d. In considering SuDS solutions, the need to protect groundwater quality must be taken into account, especially where infiltration techniques are proposed in considering a response to the presence of any contaminated land.
- e. Applicants will be required to provide a management plan to maintain SuDS in new developments, and a contribution will be required for maintenance of the scheme/SuDS
- f. Onsite attenuation options should be tested to ensure that changing the timing of peak flows does not exacerbate flooding downstream,
- g. Only in exceptional circumstances will surface water connections to the combined or surface water system be permitted. Applicants will need to demonstrate in consultation with the sewerage undertaker that there is no feasible alternative and that there will be no detriment to existing users.
- h. Applicants will be required to liaise with the lead local flood authority (Staffordshire County Council), Internal Drainage Boards, and the Environment Agency on any known flood issues, and identify issues from the outset via discussions with statutory bodies.

	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

E.9.2.1 Policy SE2 sets out the Council's approach to managing the risk of flooding and water resources within the borough. The policy would 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).

E.9.2.2 The policy promotes the use of Sustainable Drainage Systems (SuDS) to manage surface water run-off and to reduce the risk of surface water flooding and encourages 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, with reference to place making. As a result, this policy would be expected to have minor positive impacts in relation to biodiversity, water quality and the local landscape character (SA Objective 3, 6 and 8).

E.9.2.3 Overall, the policy would be expected to ensure that development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on flooding would be anticipated (SA Objective 5).

- E.9.2.4 Through seeking to ensure that development proposals take into account 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).

E.9.3 Policy SE3: Water Resources and Water Quality

Policy SE3: Water Resources and Water Quality

Development proposals that are likely to have an adverse effect on the quality, quantity and flow of both groundwater and surface water, both during the construction and operational phase will not be supported. Development proposals should:

1. Not lessen or compromise the ability of water bodies to meet the objectives of the Water Framework Directive and Habitats Directive;
2. Take into account relevant information, including the aims, objectives and actions of River Basin Management Plans affecting the Borough. This includes the Humber, North Western District and Severn River Basin Management Plans;
3. Avoid unacceptable uses within groundwater source protection zones, and to accord with the Environment Agency guidance, set out within the document entitled 'The Environment Agency's approach to groundwater protection', or any subsequent iteration of the guidance;
4. In cases of development within Groundwater Source Protection Zones (SPZs), provide a quantitative and qualitative risk assessment and mitigation strategy to manage the risk of pollution to public water and the water environment;
5. Ensure there is, or will be, adequate water infrastructure in place in relation to water supply, foul drainage, wastewater and sewage treatment;
6. Where possible, help to conserve and enhance existing watercourses (rivers and streams) and riverside habitats in line with the (biodiversity policy and green infrastructure policy). Management and mitigation measures should seek to improve water quality and create or enhance aquatic habitats

	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

- E.9.3.1 Policy SE3 seeks to conserve, and where possible enhance, the quality of watercourses, aquatic habitats and groundwater, taking into account the relevant River Basin Management Plans, and ensuring adequate water supply and management of water resources.
- E.9.3.2 The protection or improvement of water quality would 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 would help to ensure that the quality of waterbodies including those downstream associated with Habitats site designations are protected. As such, this policy would be expected to have a minor positive impact on biodiversity, water quality and human health (SA Objectives 3, 6 and 9).

E.9.4 Policy SE4: Open Space, Sports and Leisure Provision

Policy SE4: 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.
2. Proposals which result in the loss of open space or sports and recreational provision will be refused unless:
 - a. An assessment is provided which shows that the existing site is surplus to requirements and not needed to meet future recreational need;
 - b. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss;
 - c. The development will not adversely affect the function of the site; or
 - d. The replacement or alternative provision is of better quality, quantity or accessibility to the community it serves
3. This policy applies to all sites that have an open space or recreational value, including those owned by public, private and voluntary sectors.
4. The direct provision of or contributions towards sports and leisure provision will be sought in line with Playing Pitch Strategy (2019) and the Sports England Sport Pitch Calculator. Leisure provision should also refer to the Retail and Leisure Study (2019)
5. All major schemes should provide open space as a matter of good design and to support health and well-being. 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. Major residential developments should provide for open space (including amenity green space and natural and semi-natural greenspace) in accordance with table 2 below
 - b. This should be provided on site unless the site is in a location, such as a town centre, where a financial contribution to off-site provision may be considered more appropriate. Any off-site contribution should be of equivalent value to on-site provision.
 - c. For smaller residential developments, of up to 10 dwellings, where there are limitations on providing satisfactory on-site provision, a financial contribution to off-site provision may also be considered more appropriate for part or all of the open space requirement. Off-site provision must be of equivalent value to on-site provision.
6. 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.
7. Major development schemes should also make reference to Natural England's Green Infrastructure Framework and the accessible greenspace standards included in the Framework.

	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

E.9.4.1 Policy SE4 would help 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 would 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).

E.9.4.2 The provision, enhancement and maintenance of open spaces and other facilities under this policy would 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).

E.9.5 Policy SE5: Biodiversity and Geodiversity

Policy SE5: Biodiversity and Geodiversity

1. Development proposals should provide for net gain of a minimum of 10% increase (biodiversity net gain) in biodiversity units when set against the baseline biodiversity value of the site. Reference should be made to the Nature Recovery Network and Local Nature Recovery Strategy in the delivery of biodiversity net gain.
2. Major development should calculate biodiversity net gain using the most up-to-date version of the Biodiversity Metric calculation. For minor developments, the latest small sites metric (or equivalent) should be used to calculate net gain. Biodiversity net gain should be delivered on site primarily, where on site delivery is not feasible then it should be provided on land adjacent to, or as close to the development site as possible. As a last resort, net gain should be secured on land within the borough boundary.
3. Any planning application affecting designated nature conservation and geological sites should ensure that these sites are safeguarded and enhanced having regard to the status and designation of the site, as follows:-
 - a. Development proposals on or affecting internationally designated sites, including candidate sites, will only be supported where there is an overriding public need or it can be demonstrated that there will be no significant adverse effect on the integrity of these sites
 - b. 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
 - c. 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
4. 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
 - 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
5. Development resulting in the loss of 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.
6. 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.
7. The weight attributed to the protection of nature conservation interests will be commensurate to 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 would be required to demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought.
8. The Council will, where appropriate, expect ecological surveys for planning applications. These must be undertaken 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 Ecological Report Writing guidance) or as replaced.
9. 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.
10. 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.

Policy SE5: Biodiversity and Geodiversity

Development which would prevent the aims of a Biodiversity Opportunity Area from being achieved will not be permitted.

11. 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
SE5	+	+	++	+	+	+	0	0	+	0	0	0

- E.9.5.1 Policy SE5 sets out the Council's strategy with regard to the conservation and enhancement of biodiversity, geodiversity and ecological networks. 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.
- E.9.5.2 It is expected that this policy would help to protect important biodiversity and geodiversity assets in the borough from adverse impacts caused by development, whilst proposals would also be required to deliver an overall measurable net gain in biodiversity. Achieving biodiversity net gain is a requirement that relies on long term, effective and well-funded strategies. Policy SE5 also encourages biodiversity net gains to link with the emerging Nature Recovery Network and Local Nature Recovery Network, 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 would be expected (SA Objective 3).
- E.9.5.3 Vegetation and green infrastructure 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, would be likely to help protect and enhance these essential ecosystem services within the borough including amongst the 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).
- E.9.5.4 The protection of biodiversity assets would 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 would therefore be likely to have a minor positive impact on human health (SA Objective 9).

E.9.6 Policy SE6: Historic Environment

Policy SE6: Historic Environment

1. Development proposals are required to respond positively to local distinctiveness and character, respect and enhance significant views and the setting of heritage assets.
2. Proposals will avoid harm to designated and non-designated assets, including their setting in a manner suitable to their significance.
3. Applications that are likely to propose a risk to a heritage asset, will be required to submit a Heritage Assessment.
4. Development that results in any harm to, or loss of, the significance of a designated heritage assets will require clear and convincing justification. Substantial harm to or loss of:
 - a. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional
 - b. Assets of the highest significance, notably scheduled monuments, registered battlefields, grade 1 and II* listed buildings / registered parks and gardens should be wholly exceptional
5. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage assets, the Council will refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:-
 - a. The nature of the heritage asset prevents all reasonable uses of the site; and
 - b. No viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d. The harm or loss is outweighed by the benefit of bringing the site back into use.
6. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
7. Where a development proposal effects the significance of a non-designated heritage asset directly or indirectly, the scale of harm or loss will be balanced against the significant of the heritage asset.
8. The Council will not permit the loss of the whole or part of a heritage asset without evidence that demonstrates that the new development will proceed after the loss has occurred.
9. With any proposals which impact on the setting of heritage assets, developers will ensure that its design, location, siting form and appearance conserves or enhances the significance of the heritage asset, setting and surrounding key views; and consider any additional impacts on the setting of heritage assets, including the degree of permanence of any impact.
10. If such a proposal is permitted, where loss of significance is unavoidable, a recording will be made and added to the Historic Environment Record.

	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	0	+

E.9.6.1 The 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 SE6 sets out the requirement for development proposals to “*avoid harm to designated and non-designated assets, including their setting in a manner suitable to their significance*” and would ensure Heritage Assessments are carried out where there is potential for adverse effects to occur. The policy further states that proposals should respect and enhance

significant views and the setting of cultural heritage assets. A major positive impact on cultural heritage could be achieved (SA Objective 7).

E.9.6.2 The policy would 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 would be expected (SA Objective 8).

E.9.6.3 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.

E.9.7 Policy SE7: Landscape

Policy SE7: Landscape

1. Development proposals should take account of the qualities, features, characteristics and guidelines outlined in the Landscape and Settlement Character Assessment and Landscape Strategy (2022) or subsequent update. Alongside the direct impacts of the proposal, this should consider cumulative effects alongside any existing planned, or committed development
2. Development proposals should use the Landscape Strategy (2022) to design schemes that conserve character and quality and where possible enhance and effectively manage local landscape character
3. Proposals should use appropriate materials, building styles, native species and other characteristic features and elements to strengthen local landscape distinctiveness.
4. Landscaping schemes, where required, should respond sympathetically to topography, landscape features and existing green and blue infrastructure networks to help integrate the new development into the existing landscape. This should also appropriately consider the provision of maintenance and aftercare of the scheme.

	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

E.9.7.1 Policy SE7 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.

E.9.7.2 By helping to ensure that future development proposals would 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 SE7 would be 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).

E.9.7.3 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 would be expected to have a minor positive impact on cultural heritage (SA Objective 7).

- E.9.7.4 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. As such, a minor positive impact on SA Objectives 1, 3, 5, 6 and 9 could be achieved.

Appendix F: Equality Impact Assessment (EqIA)

Appendix F Contents

F.1	Introduction.....	F1
F.1.1	Overview.....	F1
F.2	Methodology.....	F2
F.2.1	Summary methodology.....	F2
F.3	Assessment by characteristic	F3
F.3.1	Summary.....	F8
F.3.2	Analysis by characteristic	F8

Tables

Table F.1.1: Assessment of potential impacts of the Newcastle-under-Lyme policies	F3
---	----

F.1 Introduction

F.1.1 Overview

F.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 to ensure plans do not discriminate in the way they provide services and do all they can to promote equality.

F.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 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 include:

- 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: 20/04/23]

F.2 Methodology

F.2.1 Summary methodology

F.2.1.1 Each policy of the Newcastle-under-Lyme 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?
If so, how?

F.3 Assessment by characteristic

Table F.3.1: Assessment of the potential impacts of the Newcastle-under-Lyme Local Plan draft policies

Policy	Protected characteristics									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	0	0	This policy sets out the strategy for development including overall employment land and housing provision, which would not be expected to directly impact any of the protected groups.
PSD2: Settlement Hierarchy	+	+	0	0	+	0	0	0	0	This policy encourages growth in line with the settlement hierarchy and provision of services and facilities. By seeking to provide new development in areas with good accessibility, the policy may have positive impacts for older age groups, disabled people and pregnant women.
PSD3: Distribution of Development	0	0	0	0	0	0	0	0	0	This policy acts on distributing homes amongst the rural and urban centers, which would not specifically impact the protected groups.
PSD4: Development Boundaries and the Open Countryside	0	0	0	0	0	0	0	0	0	This policy focuses on restricting development in the open countryside and would not directly impact any of the protected characteristics.
PSD5: Green Belt and Safeguarded Land	0	0	0	0	0	0	0	0	0	This policy outlines the role and importance of a Green Belt and would not directly impact these particular groups.

Policy	Protected characteristics									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	0	+	+	+	0	0	The policy seeks to tackle health inequalities, provide good access to services and provide inclusive design. By seeking to provide safe and accessible links to local services, the policy may have positive impacts for older age groups, disabled people and pregnant women. The protection and enhancement of open spaces, sports and leisure facilities could provide opportunities for social interaction and enhance community cohesion. This policy may also provide opportunities for interaction with nature, benefitting mental wellbeing with potential positive effects on several different groups within the community.
PSD7: Design	+	+	+	+	+	+	0	0	0	This policy seeks to follow the national design code and states developments should be accessible and inclusive to the local population, specifically referring to the characteristics of disability, age, gender and ethnicity.
CRE1: Climate Change	+	+	0	0	+	+	+	0	0	This policy relates to mitigation of and adaptation to climate change, including encouraging the use of blue/green infrastructure. This could provide opportunities for social interaction between groups. Encouraging energy efficient buildings would also help to reduce the potential for fuel poverty which may benefit those groups such as older people, families with children and others who spend more time at home.
CRE2: Renewable Energy	+	+	0	0	0	0	0	0	0	The policy has the potential to reduce fuel poverty which may benefit those groups such as older people,

Policy	Protected characteristics									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
										families with children and others who spend more time at home.
HOU1: Affordable Housing	+	+	0	0	0	0	0	0	0	This policy sets out the approach to ensure affordability for housing, which may benefit younger people buying their first home, and potentially those with disabilities.
HOU2: Housing Mix, Density and Standards	+	+	0	0	0	0	0	0	0	The policy supports provision of housing to meet the need of different members of the community, including specialist housing for older people, people with special needs including a proportion of wheelchair adaptable dwellings.
HOU3: Gypsy, Travellers and Travelling Showpeople	0	0	0	0	0	+	0	0	0	This policy seeks to meet the identified accommodation needs for Gypsies, Travellers and Travelling Showpeople, and would therefore have a positive effect on meeting the needs of this ethnic group.
EMP1: Employment	0	0	0	0	0	0	0	0	0	This policy looks at ensuring employment sites are in appropriate areas and compatible with the surrounding land use. This does not target any of these groups specifically, although may benefit the younger, working population to some extent.
RET1: Retail	0	0	0	0	0	0	0	0	0	This policy ensures development proposals do not impact the role and character of the retail centres, which would not be expected to directly impact these protected groups.

Policy	Protected characteristics									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	0	0	0	0	0	The policy supports provision of a range of infrastructure including affordable housing, transport, green infrastructure, education and healthcare. These would be delivered in accordance with other policies in the plan which is likely to lead to the provision of services closer to new communities. This has the potential to have positive effects on children and people in older age groups as well as people with disabilities.
IN2: Transport and Accessibility	+	+	0	0	+	0	0	0	0	This policy aims to ensure that development proposals contribute towards an accessible, efficient transport network. Greater access to public transport would positively impact groups with limited access to private cars. The design of active travel routes should ensure safe movement of more physically vulnerable groups in shared spaces.
SE1: Pollution, Contamination and Amenity	+	+	0	0	+	0	0	0	0	This policy seeks to minimise the generation of and exposure to pollution and includes wording to promote active travel and public transport. Greater access to public transport would positively impact groups with limited access to private cars. The design of active travel routes should ensure safe movement of more physically vulnerable groups in shared spaces.
SE2: Flood Risk, Water Resources and Management	0	0	0	0	0	0	0	0	0	This policy seeks to minimise the impact of all forms of flooding. It is not anticipated to specifically affect any protected groups.

Policy	Protected characteristics									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
SE3: Water Resources and Water Quality	0	0	0	0	0	0	0	0	0	This policy ensures the quality, quantity and flow of groundwater and surface water is not affected through following risk assessments. It is not anticipated to specifically affect any protected groups.
SE4: Open Space, Sports and Leisure Provision	+	+	0	0	0	0	0	0	0	This policy ensures the provision, maintenance and enhancement of open space across the borough including sports and recreational facilities. The policy would likely lead to the provision of open space and sports facilities closer to new communities and has the potential to have positive effects on children and people in older age groups as well as people with disabilities.
SE5: Biodiversity and Geodiversity	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance the borough's biodiversity and geodiversity, and aims to ensure developments provide for a minimum 10% net gain in biodiversity. This policy is not anticipated to specifically affect any protected groups.
SE6: Historic Environment	0	0	0	0	0	0	0	0	0	This policy aims to protect and enhance the borough's cultural heritage. It is not anticipated to specifically affect any protected groups.
SE7: Landscape	0	0	0	0	0	0	0	0	0	This policy seeks to conserve the landscape character and ensure new development is integrated well into the existing landscape. It is not anticipated to specifically affect any protected groups.

F.3.1 Summary

- F.3.1.1 The emerging Newcastle-under-Lyme Local Plan will set out a framework for the delivery of sustainable development to meet the needs of the local population and address inequalities, whilst conserving and enhancing the borough's natural and built environment. The Council intends to provide for a balanced approach which supports cohesive and sustainable communities, through carefully considering the location of new homes, economic growth and innovation.
- F.3.1.2 Many of the draft policies which have been prepared at this stage of plan-making seek to deliver benefits to the whole community in terms of delivery of infrastructure and conservation of the natural and built environment whilst not specifically targeting those with protected characteristics. However, some of the draft policies will have the potential for direct or indirect impact on the different groups. Each policy has been assessed for their potential positive, negative or neutral impact on potentially vulnerable groups as set out in the Equality Act.

F.3.2 Analysis by characteristic

Age

- F.3.2.1 The 'age' protected characteristic includes the consideration of all ages in the community. In this assessment, the draft policies have generally been found to result in positive effects for people of different ages, particularly the potentially more vulnerable age groups, such as the elderly and younger children. This includes provision of open space and sports facilities, safe warm homes, and the aim to ensure development is delivered in line with service provision to enable day-to-day needs to be met without needing to travel long distances. Policy HOU2 (Housing Mix, Density and Standards) specifically seeks to deliver housing that is suitable for older residents.

Disability

- F.3.2.2 Similarly to the potential positive benefits of draft policies on the protected characteristic of age, a number of the draft policies would be expected to have positive effects for people with disabilities owing to the provision of open spaces and safe warm homes. Additionally, positive effects would be anticipated through seeking to ensure development is delivered in line with service provision enabling day-to-day needs to be met without needing to travel long distances. Policy HOU2 (Housing Mix, Density and Standards) also specifically seeks to deliver a proportion of housing that is adaptable and accessible including those suitable for wheelchairs.

Gender

- F.3.2.3 The proposed policies within the Local Plan are generally positive for all members of the community and no differential impact has been identified on this group. Gender is mentioned specifically within Policy PSD7 (Design), although it is unclear precisely how this protected group would benefit at this stage.

Gender reassignment

- F.3.2.4 The proposed policies within the Local Plan are generally positive for all members of the community and no differential impact has been identified on this group.

Pregnancy and maternity

- F.3.2.5 Given the potential healthcare and community infrastructure needs of this protected group, some of the draft policies in the plan have been identified as having a positive impact on individuals who fall within this protected characteristic. This includes the draft policies which would help to ensure safe movement and provide accessible links to local services including healthcare facilities, for example Policy PSD6 (Health and Wellbeing).

Race

- F.3.2.6 Several draft policies have been identified as having potential to result in positive effects for individuals who fall within this protected characteristic, particularly those policies which would provide opportunities for social interaction and enhance community cohesion. Furthermore, Policy HOU3 (Gypsy, Travellers and Travelling Showpeople) would be likely to have a positive impact on meeting the accommodation needs of this ethnic group.

Religion

- F.3.2.7 Similarly to the potential positive benefits of draft policies on the protected characteristic of race, the proposed policies would help to provide opportunities for social interaction and enhance community cohesion could potentially lead to positive impacts on religion, for example Policy PSD6 (Health and Wellbeing).

Sexual orientation

- F.3.2.8 The proposed policies within the Local Plan are generally positive for all members of the community and no differential impact has been identified on this group.

Marriage and civil partnership status

- F.3.2.9 The proposed policies within the Local Plan are generally positive for all members of the community and no differential impact has been identified on this group.

No.	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
12	<p>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.</p>	<ul style="list-style-type: none"> • Will it increase accessibility of suitable employment within Newcastle-under-Lyme? • Will it provide for the needs of the economy, especially local businesses, and encourage business start-ups in the area? • Will it support the health of established centres? • Will it protect and create jobs, and encourage local jobs to be filled by local people? • Will it encourage the provision of higher paid employment? • Will it support high streets and businesses in a post Covid-19 environment? • Will it encourage diversity and quality of employment types, including rural diversification? • Will it 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.



Lepus Consulting
Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com