

[LC-1270_NuL R19_SA Repls_Lepus Responses_3_201224EH](#)

SA			
Summary of Main Issues Raised	Respondents Unique ID	Respondents Name	Lepus Comment
Why is a positive impact on table N37 highlighted for site AB2, in relation to the economy and climate change impacts	NULLP382 NULLP1305	Audley Rural Neighbourhood Plan Steering Group Audley Community Action Group	Table N.14 on page N37 of the SA Non-Technical Summary provides an overview of site assessment findings. As explained in the full site assessments (see Appendix F of the Regulation 19 SA Report), Site AB2 is located where there are few constraints to facilitating Low and Zero Carbon technologies, and the development at this site is likely to provide a net increase in employment floorspace. These attributes are identified to result in positive impacts for SA Objective 1 (Climate Change) and SA Objective 12 (Economy), in accordance with the detailed site assessment methodology as presented in Appendix E.
Site Variation AB2A has not been assessed in the Sustainability Appraisal	NULLP382 NULLP1305	Audley Rural Neighbourhood Plan Steering Group Audley Community Action Group	All reasonable alternative sites have been identified by NuLBC as the Plan-makers and evaluated in the SA. Site AB2 has been assessed in the SA process at Regulation 18 (site area 69.91ha), and subsequently an updated version of Site AB2 at Regulation 19 (site area 78.37ha).
Tables N10 & N11 highlight growth options, option 6D scores better / has better outcomes. This option excludes site AB2.	NULLP382 NULLP1305	Audley Rural Neighbourhood Plan Steering Group Audley Community Action Group	All reasonable alternatives, including the four growth scenarios 6a-6d, have been identified by NuLBC as the Plan-makers, and evaluated in the SA, with findings fed back to NuLBC to aid their decision making and selection/rejection of options alongside consideration of other evidence base information. Options 6b and 6d were identified to perform similarly against the high level SA methodology. As outlined in Appendix D of the SA, Growth Scenario 6d has been rejected by NuLBC on the basis that development of site TK30, which comprises a part of this option, is not considered appropriate at this time.
The SA is a comprehensive document and Natural England have included comments taken from the document throughout the response. The SA recognises the distinctiveness of the Plan area.	NULLPSA5	Natural England	Comments noted.

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The SA should now take account of the proposals in the draft NPPF and the revised methodology for calculating Local Housing Need – 593 for NUL	NULLP670	Jones Homes and Renew Land Baldwins Gate Ltd	The Regulation 19 version of the Newcastle-under-Lyme Local Plan, and evidence base documents including the SA, has been prepared in accordance with the NPPF as published at the time of its preparation (September 2023). Should any further reasonable alternatives be identified by the Council, these can be evaluated in the SA process.
Agreement that the baseline housing number tested in the SA, should be the outcome of the standard method.	NULLP670	Jones Homes and Renew Land Baldwins Gate Ltd	The reasonable alternative housing growth options evaluated in the SA process include the standard method for calculating Local Housing Need at the time of the Local Plan's preparation (September 2023). Should any further reasonable alternatives be identified by the Council, these can be evaluated in the SA process.
The sustainability appraisal (July 2024) scores LW53 marginally better than site LW54	NULLP771	Gladman Developments Ltd	All reasonable alternative sites identified by the Council have been evaluated in the SA process, with findings fed back to NuLBC to aid decision making. NuLBC's outline reasons for selection of Site LW53 and rejection of Site LW54 can be found in Appendix I of the Regulation 19 SA.
Acknowledge that a Sustainability Appraisal has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters	NULLP1285	National Highways	Comments noted.
Objection to Green Belt release	NULLPSA1	W Barnish	All reasonable alternative sites, including both Green Belt and non-Green Belt locations, have been identified by NuLBC, and evaluated in the SA, with findings fed back to NuLBC to aid their decision making and selection/rejection of options.
Table F.1.1 refers to site AB2 as extending to 69.91 ha with a developable employment area of 54.38ha; this is how the site was considered at the Regulation	NULLPSA4	Indurent Strategic Land	As outlined in Table F.1.1.1, new sites from the Regulation 19 stage are highlighted blue, and amended sites from the Regulation 19 stage are highlighted

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<p>18 stage but that is not made clear here. The Table then refers to site AB2 at the Regulation 19 stage as extending to 78.37ha (so expanded) but with a developable employment area of 22ha (so reduced). This is confusing. The land promoted did indeed expand between the Regulation 18 and Regulation 19 stages, better to accommodate the required floorspace with more generous Green Infrastructure provision; the site area now measures 78.31ha.</p> <p>However, the reference to 22ha in the SA – in this Table but repeated elsewhere in the document – is misleading. The floorspace to be delivered on the site to contribute to meeting the need is 220,000 sq m (so 22ha of floorspace) but within a gross site area of 78.31ha and a developable employment area of about 47.49ha. Appendix J.2 of the SA is another location where 22ha of employment land, rather than floorspace, is referred to, here suggesting a site area of 77.35ha. Other aspects of the site assessment here are confusing – for example the suggestion (paragraph J.2.2.7) that financial contributions to local schools and health facilities are required, which will not be the case for an employment allocation.</p>			<p>orange. All remaining sites assessed originally at Regulation 18 are coloured grey.</p> <p>All site specifications regarding land use/size have been provided by NuLBC. Policy AB2 of the Regulation 19 Plan states that the site is allocated for approximately 22ha of employment floorspace, which is consistent with the figures stated in the SA as the 'developable employment area'.</p> <p>The first two sentences within paragraph J.2.2.7 in relation to schools and healthcare are included in error and have no bearing on the assessment.</p>
<p>A fourth reasonable alternative should be tested in respect of the housing growth options. This should represent a higher growth option No change required</p>	NULLPSA3	Madeley Heath Development Limited	All reasonable alternatives, including housing growth options, have been identified by NuLBC and evaluated in the SA. Should any further reasonable alternatives be identified by the Council, these can be evaluated in the SA process.

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There is no reasonable alternative that considers development of scale around rural centres No change required	NULLPSA3	Madeley Heath Development Limited	There is no specific prescription in planning practice guidance as to what should constitute reasonable alternatives for a plan; the sequencing, types and numbers of alternatives considered vary. Should any further reasonable alternatives be identified by the Council, these can be evaluated in the SA process.
Page N53 states "There are no NHS hospitals providing an A&E service within the borough" This is not factually accurate. The A&E at Royal Stoke Hospital is within the borough. Such an error undermines the confidence in the sustainability appraisal.	NULLPSA2	Clare Trenchard	The Royal Stoke University Hospital lies adjacent to the Newcastle-under-Lyme Borough boundary, within the administrative area of Stoke-on-Trent.