



Duty-to-Co-operate Interim Statement of Compliance

Newcastle-under Lyme – Local Plan (at Submission Stage)

December 2024

1 Introduction

Purpose

- 1.1 The statement forms part of the evidence base for the Newcastle-under-Lyme Borough Council Final Draft Local Plan 2020-2040 (at Submission Stage) (hereafter referred to as ‘the Plan’). It sets out the Council’s approach to compliance with the Duty-to-Co-operate in the production of the Plan and identifies how the outcomes of this co-operation have influenced the Plan.
- 1.2 The engagement concerns neighbouring and closely related Local Planning Authorities, County Councils, and other prescribed bodies in relation to strategic cross-boundary matters during the preparation of the Final Draft Newcastle-under-Lyme Local Plan.
- 1.3 Such matters include (but are not limited to) housing and employment needs and distribution, Gypsy and Traveller needs, Green Belt, cross-boundary infrastructure, highways, transport, and air quality.
- 1.4 An interim version of this statement was published alongside the Final Draft Local Plan. It has subsequently been updated with the most up to date position following consultation on the Final Draft version of the Local Plan.

Legislation

- 1.5 The ‘duty to cooperate’ was introduced by section 33A of the Planning and Compulsory Purchase Act (2004) and the Localism Act (2011) as a strategic planning mechanism. Section 110 of the Localism Act 2011 places a legal duty on Local Planning Authorities, County Councils and prescribed public bodies¹ to engage constructively, actively, and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.
- 1.6 Strategic matters regarding plan-making refers to: ‘sustainable development or use of land that has or would have a significant impact on at least two planning areas.’
- 1.7 Paragraphs 24 – 27 of the National Planning Policy Framework (NPPF, December 23) recognises this duty and considers effective, joint working between relevant bodies as integral to a positive and well-prepared strategy. Paragraph 26 also identifies joint working as helping to determine additional infrastructure, and whether development needs that cannot be wholly met within a particular plan area could be met elsewhere.

¹ The list of prescribed bodies are set out in section 2 of this document

1.8 Further to this, two of the four 'tests of soundness' of Local Plans (NPPF, December 2023, Paragraph 35) directly relate to the 'duty to cooperate'. Specifically, is the Plan:

- a. "Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- c. Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

2 Strategic Context

- 2.1 Newcastle-under-Lyme Borough Council is situated in north Staffordshire. The Borough is located between Manchester and Birmingham, and directly to the west of Stoke-on-Trent urban area. It is also close to the Peak District National Park, located to the east, and Derby which is to the southeast of Stoke-on-Trent. The county town of Stafford is located to the south. Cheshire East and Shropshire Council's border the western extent of the Borough, Stafford borough to the south.
- 2.2 The local planning authorities that border the Borough and therefore could share cross-boundary strategic issues that impact both planning areas, include: -
- Stoke-on-Trent City Council (SoTC)
 - Staffordshire Moorlands District
 - Cheshire East Council
 - Stafford Borough
 - Shropshire Council
- 2.3 Newcastle-under-Lyme Borough Council is a lower tier authority in Staffordshire functioning alongside Staffordshire County Council.
- 2.4 The prescribed public bodies are outlined at Part 2 Regulation 4 of the Town and County Planning (Local Planning) England) Regulations and comprise the following that apply in the context of Newcastle-under-Lyme:-
- The Environment Agency;
 - Historic England;
 - Natural England;
 - Clinical Commissioning Groups (now Staffordshire and Stoke-on-Trent Integrated Care Board);
 - Homes England;
 - Local Highway Authority;
 - National Highways;
 - Integrated Transport Authority;
 - The Civil Aviation Authority;
 - The Office of Rail and Road.
- 2.5 Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty, but Local Planning Authorities should co-operate with them and have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making. From April 2024, the government withdrew central government support (core funding) from Local Enterprise Partnerships and transferred functions to local and combined authorities.

- 2.6 The Plan identifies a strategy for growth alongside the sites expected to deliver the strategy. It includes a suite of strategic and non-strategic policies to support the achievement of sustainable development in the Borough. The Plan, when adopted will replace legacy Local Plans, including the Newcastle-under-Lyme and Stoke-on-Trent City Council Core Strategy (adopted 2009) and will largely replace policies contained in the Newcastle-under-Lyme Local Plan (adopted 2011).

3 Current Position on Engagement

- 3.1 Newcastle-under-Lyme Borough Council has proactively engaged and undertaken the 'duty-to-co-operate' with neighbouring and closely related Local Planning Authorities, Staffordshire County Council and other key partners. The specific means utilised for engagement has varied between different partners but generally involved: -
- Continual Duty-to-Co-operate discussions in the development of the Local Plan.
 - The exchanging of formal and informal correspondence (where necessary).
 - Consultation during the various 'Regulation 18' (plan making) consultations undertaken to inform the NUL Local Plan. The 'Regulation 18' consultations undertaken to inform the Local Plan include: -
 - Issues and Strategic Options Consultation – 01 November until the 24 January 2022
 - First Draft Local Plan Consultation – 19 June 2023 until the 14 August 2023.
 - Consultation during the Regulation 19 (publication) stage of the NUL Local Plan – 12 August 2024 until the 7 October 2024
 - Duty-to-Co-operate discussions have continued during the consultation on the Regulation 19 consultation for the Local Plan, up to submission of the Local Plan for examination.
- 3.2 At an officer level, informal structures exist through the Stoke and Staffordshire Officer District Group (SDOG) meetings which are held quarterly. These meetings are an officer forum covering all the Staffordshire local planning authorities and Stoke-on-Trent City Council for discussion on matters relating to the preparation of respective Local and Neighbourhood Plans and all other planning policy matters.
- 3.3 The Staffordshire Local Nature Partnership network provides for regular meetings to share knowledge and information in relation to local nature recovery. The group focuses on the implementation of Biodiversity Net Gain and the development of Local Nature Recovery Strategies.
- 3.4 There are also examples of joint evidence base documents being produced, including the Climate Change adaptation and mitigation study prepared by the County Council and including Staffordshire Districts and Boroughs.
- 3.5 Engagement has also taken place in respect of key pieces of evidence including the Strategic Transport Assessment which has involved a steering group in its production with representatives from neighbouring

authorities and prescribed bodies including Cheshire East Council, Stoke-on-Trent City Council and National Highways.

- 3.6 As part of the preparation of the Local Plan, the Council has discussed several issues with neighbouring authorities regarding strategic cross boundary matters.
- 3.7 This section sets out the emerging position with neighbouring authorities regarding strategic cross border matters.
- 3.8 Paragraph 27 of the National Planning Policy Framework (2023) sets out the requirement for the preparation of Statements of Common Ground (SOCGs) as part of the process of preparing a Local Plan.
- 3.9 As part of the preparation of the new Local Plan, the Council has prepared SOCGs with neighbouring planning authorities / Staffordshire County Council to demonstrate the undertaking of effective and ongoing co-operation.
- 3.10 The purpose of the SOCG is to define which strategic matters require co-operation, set out which strategic matters have an agreed position on and set out where further work is required, and the process to date in addressing these matters.
- 3.11 The following sets out progress and status of the Council's SOCGs with neighbouring authorities / Staffordshire County Council. The Council will continue to monitor the statements, looking out for any changes and ensuring that they are kept up to date.

Table 1: Status of Statements of Common Ground

Neighbouring Authority / County Council	Status
Stoke-on-Trent City Council	Signed SOCG by relevant officers and Councillors.
Cheshire East Council	Signed SOCG by relevant officers
Stafford District	Signed SOCG by relevant officers and Councillors.
Staffordshire Moorlands District Council	Signed SOCG by relevant officers and Councillors.
Shropshire Council	Signed SOCG by relevant officers.
Staffordshire County Council	Signed SOCG by relevant officers and Councillors.

- 3.12 The position with neighbouring authorities on strategic cross border matters following ongoing discussions in the preparation of SOCGs is set out below for each neighbouring authority in turn.

Stoke-on-Trent City Council

Development Plan

- 3.13 The Newcastle-under-Lyme and Stoke-on-Trent City Council Core Spatial Strategy (2009) forms the current development plan and sets out the broad planning policy framework for the two areas.

Plan Making Stage

- 3.14 Between 2013 and 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. Stoke-on-Trent City Council are anticipated to undertake Regulation 18 consultation in autumn 2025, Regulation 19 consultation in spring 2026 and submission in autumn 2026.

Unmet Housing Need

- 3.15 Stoke-on-Trent City Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state that it is unable to accommodate unmet housing need from Newcastle-under-Lyme. At the time of agreement of the SOCG, Stoke-on-Trent City Council was identified in the NPPF and PPG as one of the cities where the standard method calculation of LHN includes an uplift of 35%. In providing for LHN based on the cities uplift and in view of Green Belt constraints, the council has stated that there is insufficient housing land supply to provide for any unmet housing need from Newcastle-under-Lyme Borough. Stoke-on-Trent City Council at the time of writing has not made a request for Newcastle-under-Lyme Borough Council to accommodate any unmet housing need in relation to the preparation of its new local plan.

Statement of Common Ground

- 3.16 A bilateral Statement of Common Ground has been agreed between Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council. Due to the early stage in the preparation of the Stoke-on-Trent City Local Plan, the SOCG mainly concentrates on issues relevant to the Newcastle-under-Lyme Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Stoke-on-Trent City Council Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

Strategic Matters and Record of Agreement

- 3.17 The following key matters are considered in the SOCG :

Housing

- Newcastle-under-Lyme Borough and Stoke-on-Trent City Council share the same housing market area (HMA).
- Stoke-on-Trent City Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- Stoke-on-Trent City Council at the time of writing has not made a request to Newcastle-under-Lyme to accommodate any unmet housing need.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

Employment Land

- Newcastle-under-Lyme Borough and Stoke-on-Trent City Council share the same functional economic market area (FEMA).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.
- Stoke-on-Trent City Council at the time of writing has not made a request to Newcastle-under-Lyme to accommodate any unmet employment land need.

Gypsies and Travellers / Travelling Showpeople

- The councils agree that each authority will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

Transport

- The councils agree that the transport network are interlinked and both areas feed into the strategic highway network of the A500 and M6.
- The councils agree that the Strategic Transport Assessment prepared for the NUL Local Plan has utilised the North Staffordshire Multi-Modal Transport Model, which is the accepted model for modelling the transport network across the authority areas and that site allocations should be modelled, and data included, at key points in a timely manner.
- The councils agree to ongoing discussions regarding transport matters. Stoke-on-Trent City Council have been involved in discussions on Transport through the steering group for the Strategic Transport Assessment prepared by consultants on behalf of Newcastle-under-Lyme Borough Council.

Air Quality

- The councils agree to ongoing discussions regarding the local air quality plan between Etruria and Basford.

Retail

- The councils agree that there are no strategic scale retail proposals in the Final Draft Local Plan and agree that proposals for new or additions to retail areas should consider impacts on adjoining centres.

Green Belt

- The councils agree that amendments to the Green Belt should not result in the coalescence of settlements across the two authority areas.
- The councils agree that the joint methodology (set out in the ARUP Green Belt assessment) should be used to review Green Belt boundaries.

Infrastructure

- The councils agree to produce individual infrastructure delivery plans and liaison will be maintained with Staffordshire County Council and other infrastructure providers as required. Agreement also to ongoing engagement on infrastructure matters.

Ecology, Open Space and Blue / Green Infrastructure

- The councils agree that there are no cross boundary European designated sites or SSSIs.
- Habitats, green and blue corridors that connect across the boundaries between the two authorities will be identified and improvement sought, where required.
- There are no cross boundary European designated sites or SSSI's.

Flood Risk / Drainage

- The councils agree that development should not increase the risk of flooding elsewhere. NUL has updated its level 1 Strategic Flood Risk Assessment and Water Cycle Study.

Site Specific Comments

- The City Council, in response to the First Draft Plan noted concerns around site NC77 as a site with a shared boundary between the Council's. Concerns were raised around the inclusion of the site without consideration of how the site will impact upon the Green Belt and the City. The parties agree that the Borough Council has undertaken additional work in relation to the Green Belt impacts of site NC77 and through this work alongside the implementation of site selection methodology has decided not to allocate this site in the Final Draft Local Plan.

Cheshire East Council

Development Plan

- 3.18 The Cheshire East Local Plan Strategy (2017) and Site Allocations and Development Policies Document (2022) form the Development Plan for the Cheshire East Borough.

Plan Making Stage

- 3.19 The Council have recently commenced preparation of a new style local plan prepared under the government's proposed reforms to the planning system. As a first step in the preparation of a new local plan the council consulted on an 'issues paper' from the 8th of April to 1st July 2024 to scope the issues that local plan should consider. The local development scheme anticipates that the local plan will be adopted in 2028. It is anticipated that a report will be taken to the Council's Environment and Communities Committee in the new calendar year to report on the feedback and agree next steps with the Plan.

Unmet Housing Need

- 3.20 Cheshire East has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state that it is unable to accommodate any unmet housing need from Newcastle-under-Lyme. Firstly, they have stated that as Cheshire East is within a different housing market area (HMA) accommodating any unmet housing need would not address housing needs within the Newcastle-under-Lyme HMA. Secondly, due to the early stage in review of the Cheshire East Local Plan the council has stated that it is not in a position to confirm any ability to meet unmet housing need. At the time of writing, Cheshire East has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of its new local plan.

Statement of Common Ground

- 3.21 A bilateral officer Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Cheshire East Borough Council. Due to the early stage in the preparation of the Cheshire East Local Plan the SOCG mainly concentrates on issues relevant to the Newcastle-under-Lyme Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Cheshire East Council Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

Strategic Matters and Record of Agreement

- 3.22 The following key matters are considered in the SOCG:

Housing

- The administrative areas of Newcastle-under-Lyme and Cheshire East are located within separate housing market areas (HMAs).
- Cheshire East has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- Cheshire East has not made a request to Newcastle-under-Lyme to accommodate unmet housing need.

Employment Land

- The administrative areas of Newcastle-under-Lyme and Cheshire East are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirements through preparation of its local plan.

Areas of ongoing discussion

- Cheshire East Council has objected to Policy AB2 'land at Junction 16 of the M6' and are seeking that the allocation be removed from the Local Plan.
- Cheshire East Council are concerned that the Plan has overallocated for employment land and there is misalignment between housing and employment growth advocated in the Plan.
- NUL consider that the Housing and Economic Needs Assessment and Strategic Employment Needs Assessment support the case for the allocation of the site, both from a quantitative and qualitative perspective.

Gypsies and Travellers / Travelling Showpeople

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

Transportation

- The parties agree that Cheshire East Council has been involved with discussions on Transport through a steering group for the Strategic Transport Assessment.
- Cheshire East Council has highlighted a lack of access by sustainable modes and would want to see an effective policy mechanism put in place to secure any necessary mitigation measures within Cheshire East.
- Cheshire East would like to further understand the impacts of the proposed development (AB2) on the local road network in Cheshire East, in particular, the A500 and B5078.

Education

- The parties agree that the matter of education and cross boundary pupil movements stems from discussions held to inform the Cheshire East Local Plan Strategy (adopted in 2017). Both parties agree that, following engagement on this matter, that information sharing will continue between Cheshire East and Staffordshire County Council on an operational basis rather than a strategic cross boundary matter for the Local Plan.

Strategic Employment Sites

- Cheshire East Council has objected to site AB2 'land at Junction 16 of the M6 and is seeking to have the allocation removed from the Local Plan and claim that insufficient evidence has been prepared in regard to the impacts upon Cheshire East. If the Inspector is minded to retain the site, Cheshire East has requested several modifications to Policy AB2.

Stafford Borough Council

Development Plan

- 3.23 The development plan for Stafford comprises the adopted local plan (2014) and relevant county-wide plans and neighbourhood plans.

Plan Making Stage

- 3.24 Stafford Borough Council is preparing a new Local Plan 2020-2040 to set out the future development strategy beyond the adopted Plan period of 2031, with the preferred options consultation completed in December 2022.

Unmet Housing Need

- 3.25 Stafford Borough Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state it is unable to accommodate unmet housing need from Newcastle-under-Lyme. Firstly, Stafford Borough is located within a different housing market area (HMA) and the accommodation of unmet housing need would not address housing needs within the Newcastle-under-Lyme HMA. Secondly, due to the early stage of review of the Stafford Local Plan, Stafford Borough Council is not able to confirm any ability to meet unmet housing need from Newcastle-under-Lyme Borough. Stafford Borough Council has also not made a request to Newcastle-under-Lyme Borough Council to accommodate any potential unmet housing need related to the preparation of their new local plan.

Statement of Common Ground

- 3.26 A bilateral Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Stafford Borough Council. The SOCG mainly concentrates on issues relevant to the Newcastle-under-Lyme Borough Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Stafford Borough Council Local Plan

at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

Strategic Matters and Record of Agreement

3.27 The following key matters are considered in the SOCG:

Housing

- The boroughs of Newcastle-under-Lyme and Stafford are located within separate housing market areas (HMAs).
- Stafford Borough Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- Stafford Borough Council has not made a request to Newcastle-under-Lyme to accommodate unmet housing need.

Employment Land

- The boroughs of Newcastle-under-Lyme and Stafford are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Gypsies and Travellers / Travelling Showpeople

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

Infrastructure / Transportation

- The Newcastle-under-Lyme Local Plan, at Regulation 19 stage, will be supported by an Infrastructure Delivery Plan and Strategic Transport Assessment.

Staffordshire Moorlands District Council

Development Plan

3.28 The development plan comprises the Staffordshire Moorlands Local Plan adopted in 2020 which sets out the vision and spatial strategy for the district to 2033 and relevant county-wide and neighbourhood plans.

Plan Making Stage

3.29 The Council's published local development scheme anticipates a review of the adopted local plan will be undertaken in 2025. Following this assessment if an update to the local plan is required, it is anticipated the plan will be adopted in the summer of 2028.

Unmet Housing Need

- 3.30 Staffordshire Moorlands Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state it is unable to accommodate any unmet housing need. Staffordshire Moorlands has stated that this matter can only be considered in detail following commencement of its own local plan review in 2025. Due to the timing of this review and the advanced stage of the Newcastle-under-Lyme local plan the council is unable to consider the accommodation of any unmet housing need at this time. Staffordshire Moorlands has also not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.

Statement of Common Ground

- 3.31 A bilateral Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Staffordshire Moorlands District Council. Since the council has not yet commenced a review of its local plan the SOCG and duty to co-operate matters are currently mainly concentrated on the Newcastle-under-Lyme local plan. A separate SOCG may be prepared regarding the issues relevant to the Staffordshire Moorlands Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

Strategic Matters and Record of Agreement

- 3.32 The following key matters are considered in the SOCG:

Housing

- The Borough of Newcastle-under-Lyme and Staffordshire Moorlands District are located within separate housing market areas (HMAs).
- Staffordshire Moorlands Council has confirmed it is not able to accommodate unmet housing need from Newcastle-under-Lyme.
- Staffordshire Moorlands Council has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

Employment Land

- The Borough of Newcastle-under-Lyme and Staffordshire Moorlands District are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Gypsies and Travellers / Travelling Showpeople

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

Infrastructure / Transportation

- The Newcastle-under-Lyme Local Plan, at Regulation 19 stage, will be supported by an Infrastructure Delivery Plan and Strategic Transport Assessment. Further engagement may take place following consultation on the Regulation 19 Local Plan on these matters and will be updated in subsequent versions of the SOCG.

Shropshire Council

Development Plan / Plan Making Stage

- 3.33 The Shropshire Local Plan is currently at Examination. Once adopted, the new local plan will comprise the development plan for the area together with relevant Minerals and Waste Local Plans and Neighbourhood Plans.

Unmet Housing Need

- 3.34 Shropshire Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough Council to state they are unable to accommodate any unmet housing need. They have stated that due to the advanced stage in the preparation of their local plan they are unable to consider accommodating any unmet housing need. They have also stated that in accommodating any unmet need it would lead to an unsustainable pattern of development. It is also noted that Shropshire Council is located within a different HMA.
- 3.35 As part of the preparation of the new Shropshire Local Plan a request was made to Newcastle-under-Lyme to accommodate a proportion of unmet housing need in 2020. Newcastle-under-Lyme responded to confirm it was unable to accommodate any unmet housing need. The need relates to a different HMA and through the preparation of the Newcastle-under-Lyme local plan the Borough Council has its own challenges in providing for local housing need which requires Green Belt release. Shropshire Council intends now to meet their identified LHN within their local authority area through their new local plan and there is no outstanding request for Newcastle-under-Lyme to accommodate any unmet housing need.

Statement of Common Ground

- 3.36 A bilateral officer Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Shropshire Council. An SOCG was signed between the councils regarding matters associated with the Shropshire Local Plan. A further SOCG has now been prepared that primarily focuses on the Newcastle-under-Lyme Local Plan due to the

difference in stages of the respective local plans. Duty-to-Co-operate discussions will continue between the councils as appropriate.

Strategic Matters and Record of Agreement

3.37 The following key matters are considered in the SOCG:

Housing

- The administrative areas of Newcastle-under-Lyme and Shropshire Council are located within separate housing market areas (HMAs).
- Shropshire Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- There is no outstanding request for Newcastle-under-Lyme to accommodate any unmet housing need from Shropshire. Shropshire Council proposes to meet its local housing need in full through their new local plan.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

Employment Land

- The administrative areas of Newcastle-under-Lyme and Shropshire Council are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Gypsies and Travellers / Travelling Showpeople

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

Infrastructure / Transportation

- The Newcastle-under-Lyme Local Plan, at Regulation 19 stage, will be supported by an Infrastructure Delivery Plan and Strategic Transport Assessment. The parties agree to ongoing discussions regarding transport and infrastructure matters.

Staffordshire County Council

Development Plan

3.38 The County Council is responsible for Minerals and Waste Planning in Staffordshire. The Minerals Local Plan for Staffordshire (2017) and the Waste Local plan for Staffordshire and Stoke-on-Trent (2013) are available on the website.

Plan Making Stage

- 3.39 The Staffordshire and Stoke-on-Trent joint waste local plan covers the period up to 2026, while the Staffordshire minerals local plan runs up to 2030. In line with Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), the County Council published a 5-year review of the relevant plans which has so far concluded that the Local Plans continue to work well, and that there is no immediate need for either plan to be revised. As a result, the County Council has not yet prepared a programme for the local plans to be revised.

Statement of Common Ground

- 3.40 A bilateral Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Staffordshire County Council. The County Council and the Borough Council has engaged in constructive and ongoing discussion on a number of relevant matters in relation to the Local Plan, including on Transport and Infrastructure.

Strategic Matters and Record of Agreement

- 3.41 The following key matters are considered in the SOCG:-

Employment

- The Borough Council and County Council agree that there is a need to allocate employment land in the Borough and that there is a need for at least two strategic employment sites.

Education

- The councils agree that following engagement on this matter that the Infrastructure Delivery Plan has been informed by discussions and input from Staffordshire County Council, including with the school organisation team. The IDP lists the known education infrastructure projects at this time. The parties agree to ongoing discussion regarding education matters.
- The councils agree that there is a need for the Borough Council to consider amendments to the Green Belt to accommodate the required extension to Madeley High School, following discussions with the school organisation team.

Transport

- The councils agree that officers from the County Council have been involved in the preparation of the Borough Council's Strategic Transport Assessment. The parties agree to ongoing discussion regarding transport matters.

Infrastructure

- The councils agree that officers from the County Council have been consulted on relevant infrastructure matters that have informed the development of the Infrastructure Delivery Plan.
- The councils agree that the Borough Local Plan should include a reference to the potential need to increase household waste recycling centre capacity over the Plan period.

Archaeology / Historic Environment

- The councils agree that officers from the County Council have been consulted on the Heritage Impact Assessment methodology prepared by Oxford Archaeology.

Flooding and Flood Risk

- The councils agree that officers from the County Council have been consulted on the Strategic Flood Risk Assessment prepared to support the Borough Local Plan.

Public Health and Wellbeing

- The councils agree that there has been constructive and ongoing discussions on health and wellbeing.

Employment and Skills

- The councils agree that there has been constructive and ongoing discussions on Employment and Skills and that the Plan should have regard to the Staffordshire Employment and Skills Framework.

Detailed Policy Wording

- It is acknowledged that the County Council has submitted representations to the Regulation 19 Final Draft Local Plan. The parties agree to continue to engage regarding the content of those representations, but they do not raise strategic cross boundary issues between the parties.

Prescribed Bodies

- 3.42 The Council engages with prescribed bodies on relevant strategic issues, varying in frequency and approach dependent on the nature and scale of the issues.

Table 2: Prescribed Bodies Engagement

Prescribed Bodies	Involvement in Local Plan and Strategic Matters
Environment Agency	<p>Ongoing engagement in Local Plan development through consultation. Engagement on the preparation of documents including the Habitats Regulations Assessment and Sustainability Appraisal.</p> <p>Engagement on the outcomes of the Strategic Flood Risk Assessment / Water Cycle Study. It is agreed that both the level 1 SFRA and Water Cycle Study have been undertaken in line with relevant guidance at that time to the best of knowledge.</p> <p>At Regulation 19 stage, comments were received from the Environment Agency which has led to a meeting on the 27 November. It is agreed between the parties that the Council prepare a proportionate level 2 Strategic Flood Risk Assessment on some site allocations. Further engagement may be necessary following the completion of that work. In addition, the Environment Agency are in receipt of a first draft SOCG intended to summarise areas of agreement and areas of ongoing discussion. The Environment Agency confirm that they expect to review the SOCG towards the middle of January 2025. Appendix 16 reflects this position.</p>
Historic England	<p>Ongoing engagement in Local Plan development through consultation.</p> <p>Consultation engagement on the preparation of documents including the Habitats Regulations Assessment and Sustainability Appraisal</p> <p>Engagement on the methodology for the Heritage Impact Assessment.</p> <p>Following receipt of comments, at Regulation 19 stage from Historic England, a draft SOCG has been prepared between the two parties and there is agreement to continued engagement on the draft SOCG, see appendix 14.</p>
Natural England	<p>Ongoing engagement in Local Plan development through consultation. Consultation engagement on the preparation of documents including the Habitats Regulations Assessment and Sustainability Appraisal.</p>

	<p>Following receipt of comments at the Regulation 19 stage, the Council, consultants representing the Council and Natural England have engaged on the comments raised and have agreed to the following position: -</p> <ul style="list-style-type: none"> • That Natural England and NUL have had meaningful and ongoing engagement on the Local Plan. This will continue following the submission of the Local Plan for examination. • That following the matters raised by Natural England in their Regulation 19 response, the following activities have taken place, for Air Quality: - <ul style="list-style-type: none"> ○ The Council has provided additional data, including the average annual daily traffic (AADT) for the final suite of sites assessed in the Strategic Transport Assessment at Regulation 19 stage. ○ That following the provision of average annual daily traffic data (AADT), there has been a request to undertake further air quality / emissions work to inform updates to the Habitats Regulations Assessment (where relevant). This will include ongoing and constructive engagement with Natural England ○ That the Council has engaged SWECO (for Air Quality Modelling) and Lepus Consulting (in respect of any implications for the Habitats Regulations Assessment work) ○ That following a meeting on the 18 December 2024, the scope, defined area and list of designated sites for inclusion of the study are agreed (Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI). Alongside broad agreement to the methodology to be employed. ○ That there is agreement to ongoing engagement on the outcomes of the study, expected in January 2025 • In respect of Best and Most Versatile Land. The Council has provided a briefing note on their position on Best and Most Versatile Land [ED038] to Natural England for review and feedback is expected in the new year.
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	<ul style="list-style-type: none"> It is expected that a statement of common ground will be prepared early in the new year, that will summarise areas of agreement and areas of ongoing discussion on the Local Plan. A draft has been prepared and is currently being considered by both parties.
Clinical Commissioning Group. NHS England / Integrated Care Board	<p>Ongoing engagement in Local Plan development through consultation.</p> <p>Engagement on the preparation and outcomes of the Infrastructure Delivery Plan.</p> <p>Comments received from NHS Property services to the Regulation 19 Local Plan with several comments on specific policies / viability assessment.</p>
Homes England	<p>Ongoing engagement in Local Plan development through consultation. No comments received at Regulation 19 stage.</p>
Local Highway Authority	<p>This is considered through the Staffordshire County Council Statement of Common Ground</p>
National Highways	<p>Ongoing engagement in Local Plan development through consultation.</p> <p>Involvement in steering group in the production of the Strategic Transport Assessment.</p> <p>Following comments received at Regulation 19, the Council has prepared a response to the questions and queries from National Highways and an initial response has been received. Discussions are still ongoing regarding any outstanding issues raised by National Highways in a constructive and ongoing way. It is intended that a SOCG be prepared in early 2025 that will summarise areas of agreement and areas of ongoing discussion early in the new year.</p>
Civil Aviation Authority	<p>Ongoing engagement in Local Plan development through consultation. No comments received at Regulation 19 stage.</p>
Office of Rail Regulation	<p>Ongoing engagement in Local Plan development through consultation.</p>
Network Rail	<p>Ongoing engagement in Local Plan development through consultation. No comments received at Regulation 19 stage.</p>
United Utilities	<p>Ongoing engagement in Local Plan development through consultation.</p> <p>Engagement on the preparation and outcomes of the Strategic Flood Risk Assessment / Water Cycle Study.</p> <p>Engagement on the preparation and outcomes of the Infrastructure Delivery Plan.</p>

	There is agreement that engagement will continue following the completion of the proportionate level 2 Strategic Flood Risk Assessment.
Severn Trent Water	Ongoing engagement in Local Plan development through consultation. Engagement on the preparation and outcomes of the Strategic Flood Risk Assessment / Water Cycle Study. Engagement on the preparation and outcomes of the Infrastructure Delivery Plan. No comments received at Regulation 19 stage.
Coal Authority	Ongoing engagement in Local Plan development through consultation. Comments received at Regulation 19 stage on specific detailed matters.

4 Conclusion

- 4.1 As part of the preparation of the Local Plan, the Council has discussed several issues with neighbouring authorities regarding strategic cross boundary matters.
- 4.2 This statement demonstrates that the council continues to take a proactive and structured approach to compliance with the DtC throughout the preparation of the Local Plan. The Council has undertaken structured discussions and ongoing engagement with neighbouring authorities, infrastructure providers and key stakeholders, and has demonstrated collaborative working on the strategic priorities set out in the NPPF, resulting in tangible outcomes and agreements.
- 4.3 Cooperation is an ongoing process which the council will continue to monitor regularly.

1 List of Appendices

Appendix 1 – List of Duty-to-Co-operate meetings.

Appendix 2 – Stoke-on-Trent City Council and NUL Statement of Common Ground

Appendix 3 – Stoke-on-Trent City Council letter to NUL re NUL Unmet Housing Needs

Appendix 4 – Cheshire East Borough Council and NUL Statement of Common Ground

Appendix 5 – Cheshire East Borough Council and NUL re NUL Unmet Housing Needs

Appendix 6 – Stafford Borough Council and NUL Statement of Common Ground

Appendix 7 – Stafford Borough Council letter to NUL re NUL Unmet Housing Needs

Appendix 8 – Staffordshire Moorlands District Council and NUL Statement of Common Ground

Appendix 9 – Staffordshire Moorlands District Council and NUL re NUL Unmet Housing Needs

Appendix 10 – Shropshire Council and NUL Statement of Common Ground

Appendix 11 – Shropshire Council and NUL 2021 Statement of Common Ground (for Shropshire Local Plan)

Appendix 12 – Shropshire Council response to NUL re NUL Unmet Housing Needs

Appendix 13 – Staffordshire County Council and NUL Statement of Common Ground

Appendix 14 – E-mail from Historic England on current position re Statement of Common Ground

Appendix 15 – E-mail from United Utilities re position on ongoing engagement

Appendix 16 – E-mail from the Environment Agency on ongoing engagement

Appendix 17 – E-mail from Natural England on ongoing engagement

Appendix 18 - E-mail from National Highways on ongoing engagement

Appendix 19 – Representation from Stafford Borough Council at Regulation 19 stage

Classification: NULBC UNCLASSIFIED

Table 1: Record of Meetings

Local Planning Authority	Nature of Engagement	Date
Cheshire East Council	Catch up meeting	22/04/2021
Stoke-on-Trent City Council	Duty to Co-operate – Issues and Options meeting	09/09/2021
Cheshire East Council	Duty to Co-operate – Issues and Options meeting	14/09/2021
Staffordshire Moorlands District Council	Duty to Co-operate – Issues and Options meeting	14/09/2021
Stafford Borough Council	Duty to Co-operate – Issues and Options meeting	15/09/2021
Shropshire Council	Duty to Co-operate – Issues and Options meeting	16/09/2021
Staffordshire County Council	Duty to Co-operate – Issues and Options meeting	22/09/2021
Stoke-on-Trent City Council	Catch up meeting	29/03/2022
Historic England	Duty to Co-operate meeting to discuss Draft Local Plan policies and Historic Environment Record	15/12/2022
Staffordshire Moorlands District Council	Duty to Co-operate Meeting	04/01/2023
Stafford Borough Council	Duty to Co-operate Meeting	12/01/2023
Stoke-on-Trent City Council	Statement of Common Ground meeting	02/03/2023
Cheshire East Council	Duty to Co-operate Meeting	17/01/2023
Stafford Borough Council	Duty to Co-operate Meeting	08/03/2023
Stoke-on-Trent City Council	Duty to Co-operate Meeting	29/03/2023
Shropshire Council	Duty to Cooperate Meeting	06/03/2023
Staffordshire County Council	Local Plan Liaison - Health and Wellbeing	08/03/2023
Staffordshire County Council	Local Plan Liaison - Newcastle Local Plan Site Review	05/05/2023
Staffordshire County Council	Local Plan Liaison	13/07/2023
Staffordshire County Council	Local Plan Liaison	24/07/2023
Stafford Borough	Duty to Co-operate Meeting	25/07/2023
Cheshire East Council	Duty to Co-operate Meeting	26/07/2023
Staffordshire Moorlands District Council	Duty to Co-operate Meeting	28/07/2023
Stoke-on-Trent Council	Duty to Co-operate Meeting	07/08/2023
Staffordshire County Council	Local Plan Liaison	10/08/2023
Shropshire Council	Duty to Co-operate Meeting	16/08/2023
Staffordshire County Council	Local Plan Liaison	14/09/2023
Staffordshire County Council	Local Plan Liaison	12/10/2023
Staffordshire County Council	Local Plan Liaison - Local Plan Transport Modelling	23/10/2023
Staffordshire County Council	Local Plan Liaison - Transport Discussion	10/11/2023
Staffordshire County Council	Meeting with National Highways	07/12/2023
Staffordshire County Council	Local Plan Liaison	14/12/2023

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Classification: NULBC **UNCLASSIFIED**

Stoke-on-Trent City Council	Duty to Co-operate Meeting	10/01/2024
Stafford Borough Council	Duty to Co-operate Meeting	24/01/2024
Shropshire Council	Duty to Co-operate Meeting	25/01/2024
Staffordshire Moorlands District Council	Duty to Co-operate Meeting	26/01/2024
Cheshire East Council	Duty to Co-operate Meeting	29/01/2024
Stoke-on-Trent City Council	Duty to Co-operate Meeting	30/01/2024
Staffordshire County Council	Local Plan Liaison	06/02/2024
Staffordshire County Council	Local Plan Liaison - Local Nature Recovery Strategy	13/02/2024
Staffordshire County Council / Stoke-on-Trent City Council	Strategic Transport Assessment	21/03/2024
Staffordshire County Council	Local Plan Liaison - Education	27/02/2024
Staffordshire County Council	Local Plan Liaison - Housing	29/02/2024
Cheshire East Council	Strategic Transport Assessment Discussion	04/03/2024
Staffordshire County Council	Local Plan Liaison - Environment/Ecology	05/03/2024
Staffordshire County Council	Local Plan Liaison - Employment and Skills	07/03/2024
Staffordshire County Council	Local Plan Liaison - Archaeology/Historic Environment	07/03/2024
Staffordshire County Council	Local Plan Liaison - Health and Transport	11/03/2024
Staffordshire County Council	Local Plan Liaison	15/03/2024
Staffordshire County Council & Stoke-on-Trent City Council	Strategic Transport Assessment – Steering Group	18/03/2024
Staffordshire County Council	Local Plan Liaison	25/03/2024
Cheshire East Council	Duty to Co-operate Meeting	09/04/2024
Staffordshire County Council/Stoke-on-Trent City Council	Viability Study – Developer Workshop	10/04/2024
Stafford Borough Council	Duty to Co-operate Meeting	15/04/2024
Stoke-on-Trent City Council	Duty to Co-operate Meeting	15/04/2024
Staffordshire Moorlands District Council	Duty to Co-operate Meeting	17/04/2024
Shropshire Council	Duty to Co-operate Meeting	18/04/2024
Staffordshire County Council	Local Plan Liaison - Health and Transport Meeting	24/04/2024
Staffordshire County Council	Local Plan Liaison	01/05/2024
Staffordshire County Council	Local Plan Liaison - Education	03/05/2024
Staffordshire County Council, Cheshire East Council, Stoke-on-Trent City Council	Strategic Transport Assessment Steering Group	15/05/2024
Stafford Borough Council	Duty to Co-operate Meeting	16/05/2024
Cheshire East Council	Duty to Co-operate Meeting	17/05/2024
Staffordshire Moorlands District Council	Duty to Co-operate Meeting	17/05/2024
Stoke-on-Trent City Council	Duty to Co-operate Meeting	22/05/2024
Staffordshire County Council	Strategic Transport Assessment Meeting	03/06/2024
Staffordshire Moorlands District Council	Duty to Co-operate Meeting	06/09/2024

Staffordshire County Council	Local Plan Liasion Meeting	13/09/2024
Stafford Borough Council	Duty to Co-operate Meeting	16/09/2024
Cheshire East Council	Duty to Co-operate Meeting	07/10/2024
Stoke-on-Trent City Council	Duty to Co-operate Meeting	07/10/2024
Stoke-on-Trent City Council	Duty to Co-operate Meeting	14/11/2024
Natural England	Duty to Co-operate Meeting	21/10/2024
Natural England	Duty to Co-operate Meeting	11/11/2024
Stoke-on-Trent City Council	Duty to Co-operate Meeting	14/11/2024
Environment Agency	Duty to Co-operate Meeting	27/11/2024
Cheshire East Council	Duty to Cooperate Meeting	04/12/2024
Historic England	Duty to Co-operate Meeting	13/12/2024
Natural England	Duty to Co-operate Meeting	18/12/2024

Classification: NULBC **UNCLASSIFIED**

STATEMENT OF COMMON GROUND BETWEEN NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND STOKE-ON-TRENT CITY COUNCIL

1. Introduction

- 1.1 This statement of common ground (SOCG) has been prepared by Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council in relation to the Newcastle-under-Lyme Borough Council Final Draft Local Plan (at Submission Stage). It reflects the position between the two parties on a number of strategic matters and shared issues.
- 1.2 The purpose of the Statement is to document the strategic cross boundary matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and if appropriate those matters where work is ongoing to resolve differences. The Statement is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.
- 1.3 The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Newcastle-under-Lyme Local Plan 2020-2040.

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council.
- 2.2 This is a statement of common ground between the parties. The statement provides a record of officer discussions and how far this has gone towards resolving cross boundary issues. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.
- 2.3 A draft SOCG was published alongside the consultation on the Final Draft Local Plan, at Regulation 19 stage. No representations were received by Stoke-on-Trent City Council to the consultation on the Final Draft Local Plan.
- 2.4 Formal approval of the SOCG has been made by the following Officers and Members
 - Newcastle-under-Lyme Borough Council, Service Director (Planning) Craig Jordan
 - Newcastle-under-Lyme Borough Council, Portfolio Holder (Strategic Planning), Cllr Andrew Fear
 - Stoke-on-Trent City Council; Head of Planning Services (Interim) Thomas Coates
 - Stoke-on-Trent City Council Cabinet Member for Housing and Planning, Councillor Chris Robinson

3. Relevant Local Authorities and Geography

- 3.1 Stoke-on-Trent City Council is a city and unitary authority formed of six towns comprising Burslem, Fenton, Hanley, Longton, Stoke and Tunstall. Newcastle-under-Lyme Borough Council is a borough in the County of Staffordshire. The location of the two authorities are identified in the map below:-

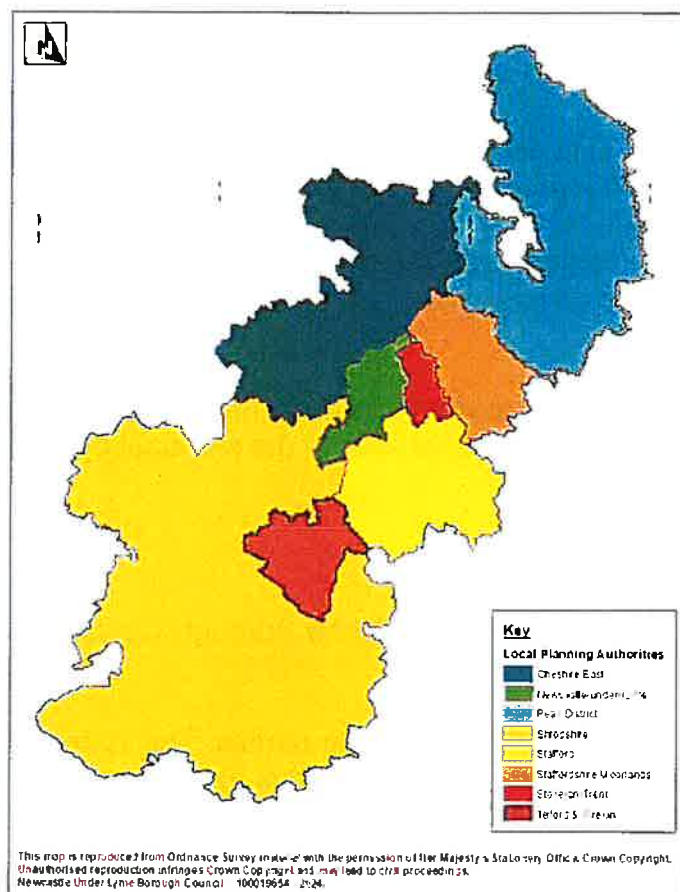


Figure 1 Newcastle under Lyme Borough in Context

- 3.2 The Newcastle-under-Lyme and Stoke-on-Trent City Council Core Spatial Strategy (2009) forms the current development plan and sets out the broad planning policy framework for the two areas.
- 3.3 Between 2013 & 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. The Borough Council consulted on Strategic Issues and Options in 2021/22 and the First Draft Local Plan in the summer of 2023. The Local Development Scheme for Newcastle-under-Lyme Borough Council can be access here:-<https://www.newcastle-staffs.gov.uk/planning-policy/local-development-scheme>

- 3.4 Stoke-on-Trent City Council are currently preparing their new Local Plan. The current programme for the local plan was considered by the Council's Cabinet on the 21 May 2024 and can be viewed here: - https://www.stoke.gov.uk/info/20071/joint_local_plan/317/joint_local_plan_timetable Stoke-on-Trent City Council are anticipated to undertake Regulation 18 consultation in autumn 2025, Regulation 19 consultation in spring 2026 and submission in autumn 2026.
- 3.5 Given the respective timescales for the preparation of local plan documents, this SOCG focuses on those issues relevant to Newcastle-under-Lyme Borough Council Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Stoke-on-Trent City Council Local Plan at an appropriate time in its preparation process. However, Duty-to-Co-operate discussions will continue as both Local Plans progress.
- 3.6 This SOCG supersedes an agreement signed in November 2022 but follows a similar structure in respect of the strategic matters raised.

4. Strategic Matters and Record of Agreement

Housing

- 4.1 The parties agree that the City of Stoke-on-Trent and Newcastle-under-Lyme function as a joint housing market area.
- 4.2 The parties agree that following engagement on this matter, that Stoke-on-Trent is unable to accommodate any unmet housing need from Newcastle-under-Lyme. The parties also agree that, at the time of writing, Stoke-on-Trent has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.
- 4.3 At the time of writing, Stoke-on-Trent City Council is identified in the NPPF and PPG as one of the cities where the standard method calculation of LHN includes an uplift of 35%. In providing for LHN based on the cities uplift and in view of Green Belt constraints, Stoke-on-Trent City Council has stated that there is insufficient housing land supply to currently provide for any unmet housing need from Newcastle-under-Lyme Borough.

Economy

- 4.4 The parties agree that the City of Stoke-on-Trent and Newcastle-under-Lyme form a functional economic area.
- 4.5 The Newcastle-under-Lyme HENA identifies a projected employment land requirement of a minimum of 63 hectares over the plan period 2020 – 2040. This is balanced against employment land supply of approximately 43 hectares as of March 2023.

- 4.6 The parties agree that following engagement on this matter, that, at the time of writing, there has been no request from Stoke-on-Trent City Council to accommodate any unmet employment land need and the councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Gypsy and Travellers / Travelling Showpeople

- 4.7 Newcastle-under-Lyme has commissioned evidence in the form of an update to its Gypsy and Traveller and Travelling Showperson Needs Assessment (Arc4, 2024). The nature of provision means that each individual Council area will meet authority area specific need.
- 4.8 The parties agree that, following engagement on this matter, that each authority will meet its own Gypsy and Traveller and Travelling Showperson need.

Transportation

- 4.9 The Transport network of Stoke-on-Trent and Newcastle-under-Lyme are interlinked and both areas road network feeds onto the strategic highway network on the A500 and M6.
- 4.10 The parties agree that the North Staffordshire Multi-Modal Transport Model is the accepted model for modelling the transport network across both authority areas.
- 4.11 The parties agree that the site allocations should be modelled and that data will be fed into the model at key points in a timely manner.
- 4.12 The Strategic Transport Assessment prepared to support the Newcastle-under-Lyme Local Plan (regulation 19) has utilised the North Staffordshire Multi-Modal Transport Model and has modelled allocations proposed.
- 4.13 The parties agree to ongoing discussions regarding transport matters. Stoke-on-Trent have been involved with discussions on Transport through the steering group for the Strategic Transport Assessment prepared by consultants on behalf of Newcastle-under-Lyme Borough Council.

Air Quality

- 4.14 Newcastle-under-Lyme has 3 designated Air Quality Management Areas:
- Newcastle-under-Lyme town centre
 - Kidsgrove town centre
 - May Bank, Wolstanton and Porthill
- 4.15 The Little Madeley AQMA was approved for revocation in September 2023.

- 4.16 Stoke-on-Trent City Council has a designated Air Quality Management Area Order 2011 which covers 10 different monitoring areas within its boundary.
- 4.17 In 2018 the Government issued a Ministerial Direction to the Borough and City Councils, requiring the preparation of a local air quality plan (across authority boundaries) between Etruria and Basford.
- 4.18 Transport solutions to reduce traffic and ensuring a free-flowing transport network are critical to prevent the cumulative impact of development decreasing air quality
- 4.19 The parties agree to ongoing discussions regarding the local air quality plan between Etruria and Basford.

Retail

- 4.20 The parties agree that the conurbation has an interrelated network of retail centres / retail parks and that strategic scale retail plans could impact upon the vitality and viability of other centres.
- 4.21 The parties agree that there are no strategic scale retail proposals in the Final Draft Local Plan and agree to proposals for new or additions to retail areas to consider impacts on other centres.

Green Belt

- 4.22 The Councils' Green Belt forms part of the wider North Staffordshire Green Belt designated in 1967 and is contiguous with the Green Belt in Cheshire East, Staffordshire Moorlands and Stafford.
- 4.23 The Councils jointly commissioned ARUP to undertake a Green Belt Assessment in two parts with the first part completed in 2017 and second in 2020.
- 4.24 Whilst the assessment acknowledges different forms, scales and functions of the Green Belt for the two authorities, the original four aims of the 1967 designation of the North Staffordshire Green Belt were largely related to avoiding the coalescence of distinct settlements, particularly with the Potteries conurbation.
- 4.25 It is agreed that amendments to the Green Belt should not result in the coalescence of settlements across the two authority areas.
- 4.26 The parties agree that the joint methodology (set out in the Arup Green Belt Assessment) should be used to review Green Belt Boundaries.

Infrastructure

- 4.27 The parties agree to produce individual infrastructure delivery plans and liaison will be maintained with Staffordshire County Council and other infrastructure providers as required. The parties agree to ongoing engagement on infrastructure matters.

Ecology, Open Space and blue / green infrastructure

- 4.28 The parties agree that habitats, green and blue corridors that connect (or where opportunities for connectivity exist) across the Authorities boundaries will be identified and opportunities for improvement sought where required.
- 4.29 That a joint strategic approach for the care, management and enhancement of the existing green and blue infrastructure is required to ensure that the wider benefits of the network are maximised.
- 4.30 That there are no cross boundary European designated sites or SSSI's.

Flood Risk / Drainage

- 4.31 The River Trent flows from the north east to the south west through the centre of Stoke-on-Trent with two other tributaries forming Main Rivers (Fowlea Brook and Lyme Brook). The Lyme Brook originates in Newcastle-under-Lyme. The River Lea is also found in the west of Newcastle-under-Lyme. The two Authority areas are both in the Severn Trent Water Resource Zone.
- 4.32 The parties agree that new development should not increase the risk of flooding elsewhere. Newcastle-under-Lyme Borough Council has updated its level 1 Strategic Flood Risk Assessment and Water Cycle Study.

Site Specific Comments

- 4.33 The City Council, in response to the First Draft Plan noted concerns around site NC77 as a site with a shared boundary between the Council's. Concerns were raised around the inclusion of the site without consideration of how the site will impact upon the Green Belt and the City.
- 4.34 The parties agree that the Borough Council has undertaken additional work in relation to the Green Belt impacts of site NC77 and through this work alongside the implementation of site selection methodology has decided not to allocate this site in the Final Draft Local Plan.

5. Duty-to-Co-operate Agreement

- 5.1 The parties agree that Newcastle-under-Lyme has fulfilled its Duty-to-Co-operate with Stoke-on-Trent City Council in respect of the Newcastle-

under-Lyme Final Draft Borough Local Plan (2020-2040). The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

6. Signatories and Governance Arrangements

6.1 The City Council and Borough Council remain committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond.

6.2 In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the local authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Councillor level where necessary;
- that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of forming the local plan;
- to continue to work in the spirit of collaboration, whilst acknowledging each other's' timetables and timescales; and
- To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Newcastle-under-Lyme Borough Council	Newcastle-under-Lyme Borough Council
Name: Craig Jordan	Name: Andrew Fear
Position: Service Director Planning	Position: Portfolio Holder (Spatial Planning)
Date Agreed: 3/12/24	Date Agreed: 3/12/24
Stoke-on-Trent City Council	Stoke-on-Trent City Council
Name: Thomas Coates	Name: Councillor Chris Robinson
Position: Head of Planning Services (Interim)	Position: Cabinet Member for Housing and Planning
Date Agreed: 28.11.2024	Date Agreed: 28/11/2024

Your reference 2022 DTC SCC2
Our reference
Date 30 January 2023



City of
Stoke-on-Trent

Housing Development and Growth
Civic Centre
Glebe Street
Stoke-on-Trent
ST4 1HH

Simon McEneny
Executive Director – Growth and Development
Newcastle-under-Lyme Borough Council
Castle House
Barracks Road
Newcastle-under-Lyme
Staffordshire
ST5 1BL

Dear Simon,

Duty to Co-operate – Statement of Common Ground and Unmet Housing Need

Thank you for your letter dated 5th December 2022 regarding the Newcastle-under-Lyme Borough Council's unmet housing need.

As you will be aware, we are currently progressing with a Stoke-on-Trent Local Plan. We have undertaken consultation on Issues and Options in 2021 and are now preparing a draft plan. A large amount of evidence gathering has also taken place and is ongoing. Since the Issues and Options consultation, the Government's amendment to the standard method for calculating Local Housing Need has seen Stoke-on-Trent's minimum housing need rise by 35%.

Over the last few years the Council has been successful in its delivery of development showing a score of 188% on the latest Housing Delivery Test. As with Newcastle-under-Lyme, Stoke-on-Trent is also tightly bounded by Green Belt. Due to both of these issues, as shown in the Issues and Options consultation, there is not a significant Stoke-on-Trent supply of housing land, above the recognised need.

Therefore, it is unfortunate that the City Council would not be in a position to assist in the delivery of Newcastle-under-Lyme Borough Council's unmet housing need.

Further to the issues on housing supply, we look forward to working with Newcastle-under-Lyme Borough Council on cross boundary issues. As such we attached a signed version of the Statement of Common Ground.

If you are responding to this, please address your correspondence to Thomas Lewis, Stoke-on-Trent City Council, [REDACTED]

Yours sincerely

[REDACTED]

Assistant Director | Investment, Planning and Regeneration

Email [REDACTED]

Contact number [REDACTED]

Tell us if you need this letter in an alternative format

Get in touch

Telephone: 01782 234 234 stoke.gov.uk



STATEMENT OF COMMON GROUND BETWEEN NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND CHESHIRE EAST BOROUGH COUNCIL

1. Introduction

- 1.1 This statement of common ground (SOCG) has been prepared by Newcastle-under-Lyme Borough Council and Cheshire East Borough Council in relation to the Newcastle-under-Lyme Borough Council Final Draft Borough Local Plan (at Submission Stage). It reflects the position between the two parties on a number of strategic matters and shared issues.
- 1.2 The purpose of the Statement is to document the strategic cross boundary matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and if appropriate those matters where work is ongoing to resolve differences or where there are matters not agreed. The Statement is intended to be 'live' and updated as circumstances change, and agreement occurs on any outstanding issues.
- 1.3 The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Newcastle-under-Lyme Borough Local Plan 2020-2040.

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Cheshire East Borough Council.
- 2.2 This is a statement of common ground between the parties. The statement provides a record of discussions between the two authorities and how far this has gone towards resolving cross boundary issues. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.
- 2.3 A draft SOCG was published alongside the consultation on the Final Draft Local Plan, at Regulation 19 stage. Representations were received by Cheshire East Council to the Final Draft Local Plan.
- 2.4 Formal approval of the SOCG has been made by the following Officers and Members
 - Newcastle-under-Lyme Borough Council, Service Director (Planning), Craig Jordan
 - Cheshire East Borough Council, Head of Planning, David Malcolm

3. Relevant Local Authorities and Geography

- 3.1 Cheshire East Borough Council is unitary authority. Newcastle-under-Lyme is a borough council in the county of Staffordshire. The location of the two authorities are identified in the map below:-

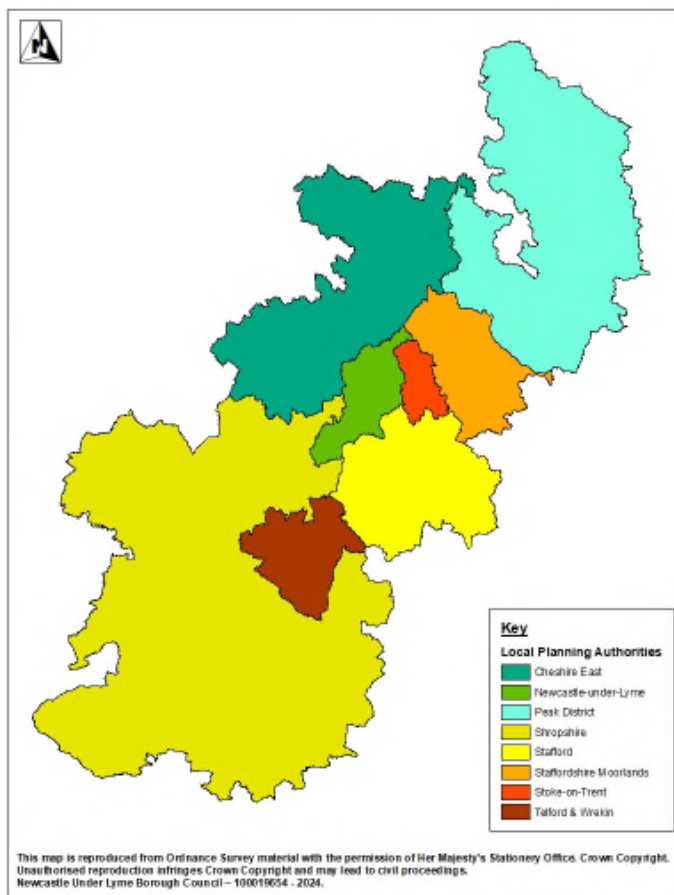


Figure 1: Newcastle-under-Lyme Borough in Context

3.2 The Cheshire East Local Plan Strategy (2017) and Site Allocations and Development Policies Document (2022) form part of the development plan for the Borough¹. In November 2023, the council resolved to update the Local Plan Strategy in the form of the new-style local plan prepared under the government's proposed reform to the plan making system. The council's Local Development Scheme (CELDS) was subsequently updated in March 2024. The CELDS anticipates the adoption of a new Local Plan by 2028, based on an assumption the government would publish the necessary regulations and national policy to enable a formal start to be made on new style plans towards the end of 2024. However, these national plan-making reforms did not materialise as promised. The Local Development Scheme for Cheshire East Borough Council can be accessed here:-

<https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/cheshire-east-local-development-scheme.pdf> .

A Local Plan Issues Paper and associated documents were published for feedback between April and July 2024, alongside a call for sites. It is

¹ Made Neighbourhood Plans the saved policies within the Cheshire Replacement Minerals Local Plan (1999) and Cheshire Replacement Waste Local Plan (2007) also form part of the development plan.

anticipated that a report will be taken to the Council's Environment and Communities Committee in the new calendar year to report on the feedback and agree next steps with the Plan, taking account of the government's proposed changes to national planning policy, confirmation of its timetable for implementing plan-making reforms and revised transitional arrangements for local plans.

- 3.3 Between 2013 & 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. The council consulted on Strategic Issues and Options in 2021/22 and the First Draft Local Plan in the summer of 2023. The council consulted on the Final Draft Local Plan in the summer of 2024. The Local Development Scheme for Newcastle-under-Lyme Borough Council can be accessed here: - <https://www.newcastle-staffs.gov.uk/planning-policy/local-development-scheme>
- 3.4 Given the respective timescales for the preparation of Local Plan documents, this SOCG focuses on those issues relevant to Newcastle-under-Lyme Borough Council Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Cheshire East Local Plan at an appropriate time in its preparation process. However, Duty-to-Co-operate discussions will continue as both Local Plans documents progress.

4. Strategic Matters and Record of Agreement / Areas of Ongoing Discussion

Housing

Areas of Agreement

- 4.1 The parties agree that Cheshire East and Newcastle-under-Lyme Borough Council form separate housing market areas.
- 4.2 The parties agree that following engagement on this matter, that Cheshire East is unable to accommodate any unmet housing need from Newcastle-under-Lyme. The parties also agree that Cheshire East has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.

Areas of Ongoing Discussion

Cheshire East Council ("CEC")

- 4.3 CEC have objected to Policy AB2 'Land at Junction 16 of the M6' and are seeking to have the allocation removed from the Local Plan. Reference should be made to the representation of Cheshire East [reference NULLP1275].

- 4.4 CEC believe that there is currently misalignment between the level of employment growth advocated in the Local Plan and the level of housing proposed.

Newcastle-under-Lyme Borough Council ("NULBC")

- 4.5 It is the position of NULBC that the Local Plan has been informed by the Housing and Economic Needs Assessment, which has identified the standard method housing figure for the Borough (in line with paragraph 61 of the National Planning Policy Framework) as an advisory starting point and then established a housing requirement figure. The housing requirement is higher than the standard method identified figure, principally in response to growth ambitions linked to economic development. The Local Plan has also been appropriately informed by studies, including the Strategic Transport Assessment, Strategic Employment Needs Assessment and Infrastructure Delivery Plan in relation to matters such as infrastructure and transport.

Economy

Areas of Agreement

- 4.6 The parties agree that Cheshire East and Newcastle-under-Lyme Borough Council form separate functional economic areas.
- 4.7 The parties agree that following engagement on this matter, the councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through the preparation of its local plan.

Areas of Ongoing Discussion

Cheshire East Council ("CEC")

- 4.8 CEC have objected to Policy AB2 'Land at Junction 16 of the M6' and are seeking to have the allocation removed from the Local Plan [reference NULLP1275].
- 4.9 CEC have asked for further clarification on the amount of employment land assumed in the Council's employment land supply.
- 4.10 CEC are concerned that the Local Plan has overallocated for employment land in the Plan and that the imbalance between planned levels of housing and economic development and the implications of this have not been considered sufficiently in the Plan.
- 4.11 Linked to the above, CEC believe that NULBC have not considered sufficiently matters such as commuting patterns, housing demand and infrastructure requirements.

- 4.12 CEC note that the evidence advances the case for regional logistics development, but the proposed allocation is for general employment use.

Newcastle-under-Lyme Borough Council ("NULBC")

- 4.13 NULBC have provided a note of clarification on the amount of employment land assumed in the Council's employment land supply in response to the matters raised by Cheshire East, however Cheshire East do not consider that this addresses the concerns that they have raised about Policy AB2 and the plan's mismatch between its housing and economic strategies.
- 4.14 Draft Policy PSD1 'Overall Development Strategy' makes clear that land at Junction 16 of the M6 is a strategic site serving the wider sub-regional economy and the site-specific wording facilitates that position.
- 4.15 NUL consider that the Housing and Economic Needs Assessment and Strategic Employment Needs Assessment supports the case for the allocation of the site, including the quantitative and qualitative case for the site, recognising the diminishing existing employment land supply in the borough and that the allocation supports growth in the wider sub-region.

Strategic Employment Sites

Areas of Agreement

- 4.16 There have been discussion and engagement on the potential strategic employment locations in the First Draft Newcastle-under-Lyme Local Plan including inviting Cheshire East onto the steering group for the Council's Strategic Transport Assessment.
- 4.17 Discussion will continue regarding strategic employment sites in the Final Draft Newcastle-under-Lyme Borough Council Local Plan.

Areas of Ongoing Discussion

Cheshire East Council ("CEC")

- 4.18 CEC have objected to Policy AB2 'Land at Junction 16 of the M6' and are seeking to have the allocation removed from the Local Plan and that insufficient evidence has been prepared on the impacts upon Cheshire East.
- 4.19 In the event that the Inspector is minded to retain the site, CEC have requested a number of modifications to Policy AB2

Newcastle-under-Lyme Borough Council ("NULBC")

- 4.20 NULBC consider that the allocation AB2 is supported by a detailed evidence base, published alongside the Local Plan. NULBC is open to ongoing dialogue with CEC regarding the site and will consider those items raised by CEC.

Gypsy and Travellers / Travelling Showpeople

- 4.21 Newcastle-under-Lyme has commissioned evidence in the form of an update to its Gypsy and Traveller and Travelling Showperson Needs Assessment (Arc4, 2024).
- 4.22 Following engagement on this matter, the parties agree that NuL will meet its own Gypsy and Traveller and Travelling Showperson need.

Transportation

Areas of Agreement

- 4.23 CEC have been involved with discussions on Transport through the steering group for the Strategic Transport Assessment prepared by consultants on behalf of Newcastle-under-Lyme Borough Council.

Areas of Ongoing Discussion

- 4.24 CEC have highlighted that there is a lack of access by sustainable transport modes to and from proposed allocation AB2. CEC are also keen to understand what impacts this proposed development would have on the local road network in Cheshire East, in particular the A500 and B5078. CEC would want to see an effective policy mechanism put in place to secure any necessary mitigation measures within Cheshire East, in agreement with CEC.

Education

- 4.25 The parties agree that the matter of education and cross boundary pupil movements stems from discussions held to inform the Cheshire East Local Plan Strategy (adopted in 2017). Both parties agree that, following engagement on this matter, that information sharing will continue between Cheshire East and Staffordshire County Council on an operational basis rather than a strategic cross boundary matter for the Local Plan.

5. Duty-to-Co-operate Agreement


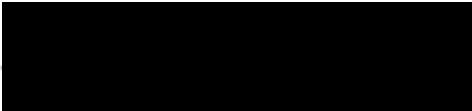
- 5.1 The parties agree that the two councils have engaged constructively and actively on strategic cross boundary matters to date and will continue to do so. The parties recognise that there are outstanding issues and that both will continue to work closely and where relevant with other prescribed bodies on strategic cross boundary issues.

6. Signatories and Governance Arrangements

- 6.1 In terms of governance, the authorities agree:
- that in response to any new evidence / changes in circumstances, discussions will occur between the local authorities on the cross-boundary

issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Councillor level where necessary;

- that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of forming the local plan;
- to continue to work in the spirit of co-operation, whilst acknowledging each other's' timetables and timescales; and
- To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Cheshire East Borough Council	Newcastle-under-Lyme Borough Council
Name: David Malcolm	Name: Craig Jordan
Position: Head of Planning	Position: Service Director Planning
Date Agreed: 16 December 2024	Date Agreed:17 December 2024
Signature: 	Signature: 



Working for a brighter future together
Environment and Neighbourhood Services

1st Floor, Westfields
c/o Municipal Buildings
Earle Street
CREWE
CW1 2BJ

Allan Clarke
Planning Policy Manager

Newcastle-under-Lyme Borough
Council

www.cheshireeast.gov.uk

Sent by email only

DATE: 8 March 2023

OUR REF: SP/SP25/xi

Dear Allan,

Re: Duty to Co-operate, NUL unmet housing need

I write in response to your letter dated 5 December 2022 in which you seek to understand whether Cheshire East Council is able to assist in accommodating a proportion of Newcastle under Lyme's housing need within Cheshire East.

I appreciate that, at this stage, we have not been able to review the full extent of evidence to demonstrate that Newcastle is unable to meet its own housing need in full. That said, I think two of the substantive reasons set out in our previous letter to you explaining why Cheshire East could not agree to your request still apply.

Firstly, that the Cheshire East Local Plan Strategy has established that Cheshire East is its own housing market area. Therefore, it is not clear how Cheshire East agreeing to meet some of your housing numbers will actually address the identified housing needs of your Borough and its wider housing market area. It follows that the provision of housing outside of your housing market area may lead to unsustainable patterns of development from a travel and transport point of view. It risks increasing pressure on the transport infrastructure which connects our areas.

Secondly, that the practical issue of the mismatch in the timing of plan preparation remains. The Council's adopted Local Plan covers the plan period 2010 to 2030. It was prepared solely on the basis of meeting this Council's needs and, while we do currently have a healthy 5 year supply position, this belies the fact that the Council is still

addressing a position of housing under delivery from the start of the plan period (to the extent of around 762 homes at 31.3.22). Cheshire East Council has reviewed its Local Plan Strategy and decided that an update to it is necessary. However, this is at the very start of the plan-making process and will take a number of years to prepare. It will be informed by its own evidence of housing need and land supply. We don't know what that evidence will say and we are not yet in a position to understand what our own future needs will be and how/whether they might be accommodated. As you know, land was removed from the Green Belt in the current Local Plan Strategy to meet Cheshire East's development needs to 2030.

In summary, we are not able to agree to accommodate a proportion of Newcastle-under-Lyme's housing need. However, we appreciate the regular and constructive dialogue that we have regarding cross boundary matters.

Yours sincerely

Stuart Penny

Planning Policy & CIL Manager

STATEMENT OF COMMON GROUND BETWEEN NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND STAFFORD BOROUGH COUNCIL

1. Introduction

- 1.1 This statement of common ground (SOCG) has been prepared by Newcastle-under-Lyme Borough Council and Stafford Borough Council in relation to the Newcastle-under-Lyme Borough Council Final Draft Local Plan (at Submission Stage). It reflects the position between the two parties on a number of strategic matters and shared issues.
- 1.2 The purpose of the Statement is to document the strategic cross boundary matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and if appropriate those matters where work is ongoing to resolve differences. The Statement is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.
- 1.3 The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Newcastle-under-Lyme Local Plan 2020-2040.

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Stafford Borough Council.
- 2.2 This is a statement of common ground between the parties. The statement provides a record of officer discussions and how far this has gone towards resolving cross boundary issues. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.
- 2.3 A draft SOCG was published alongside the consultation on the Final Draft Local Plan, at Regulation 19 stage. Representations were received by Stafford Borough Council on the 8 October 2024.
- 2.4 Formal approval of the SOCG has been made by the following Officers and Members
 - Newcastle-under-Lyme Borough Council, Service Director (Planning), Craig Jordan
 - Newcastle-under-Lyme Borough Council, Portfolio Holder (Strategic Planning), Cllr Andrew Fear
 - Stafford Borough Council, Head of Economic Development & Planning, Dean Piper
 - Stafford Borough Council, Portfolio Holder (Economic Development & Planning), Cllr Ant Reid

3. Relevant Local Authorities and Geography

- 3.1 The two administrative areas of Newcastle-under-Lyme and Stafford Borough fall within the County of Staffordshire. The location of the two authorities are identified in the map below within the context of Staffordshire, Shropshire and parts of Cheshire:-

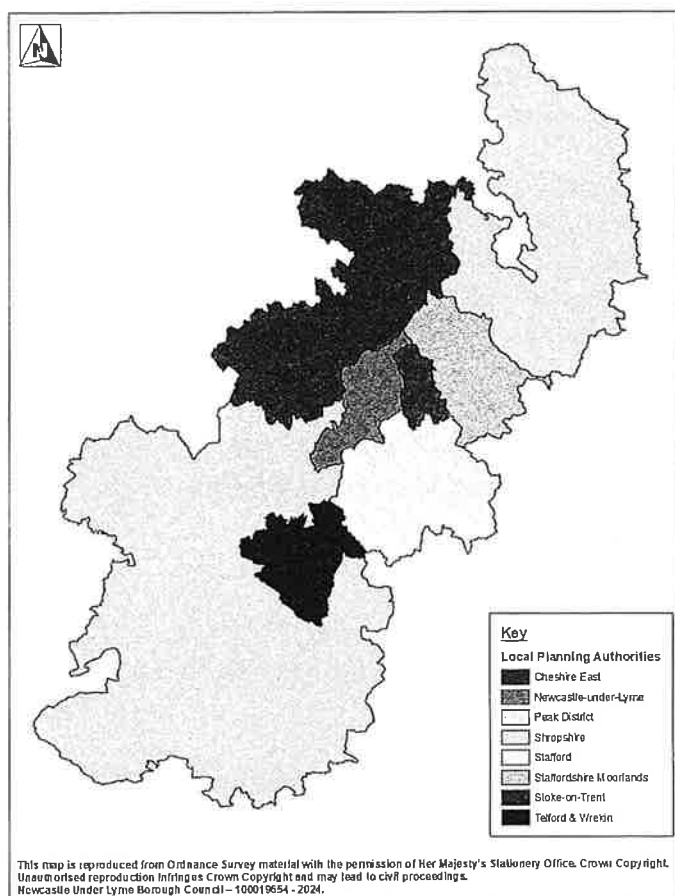


Figure 1: Newcastle-under-Lyme Borough in Context

- 3.2 The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town. The Borough Council is preparing a new Local Plan 2020-2040 to set out the future development strategy beyond the adopted Plan period of 2031, with the preferred options consultation completed in December 2022. The Local Development Scheme for Stafford Borough can be accessed here:- <https://www.staffordbc.gov.uk/local-development-scheme>
- 3.3 Between 2013 & 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. The Borough Council consulted on Strategic Issues and Options in 2021/22 and the First Draft Local Plan in the summer of 2023. The Local Development Scheme for Newcastle-under-Lyme Borough Council can be accessed

here: <https://www.newcastle-staffs.gov.uk/planning-policy/local-development-scheme>

- 3.4 Given the respective timescales for the preparation of local plan documents, this SOCG focuses on those issues relevant to Newcastle-under-Lyme Borough Council's Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Stafford Borough Local Plan at an appropriate time in its preparation process. However, Duty-to-Co-operate discussions will continue as both Local Plans documents progress.

4. Strategic Matters and Record of Agreement

Housing

- 4.1 The parties agree that Stafford Borough Council and Newcastle-under-Lyme Borough Council form distinct housing market areas.
- 4.2 Newcastle-under-Lyme Borough Council has prepared a Housing and Economic Needs Assessment (HENA) (Turley's, 2024) and Stafford Borough has published an Economic & Housing Development Needs Assessment (EHDNA) in February 2020 (Lichfields, 2020). Using Government's standard methodology, the report calculates a local housing need of some 347 dwellings per annum, as at 31 March 2023 (which equates to 6,940 dwellings over the Plan period (2020-2040).
- 4.3 In accordance with the National Planning Policy Framework and Planning Practice Guidance, the HENA update has considered if there are circumstances which justify setting the local plan housing requirement above Local Housing Need (LHN) (as derived from the standard method). In relation to the local plan economic strategy (and associated population growth), projected employment land requirements and affordable housing, there is justification in setting the housing requirement above LHN. The housing requirement is therefore 400 dwellings per annum (8,000 dwellings over the Plan period (2020-2040).
- 4.4 The parties agree that, following engagement on this matter, that Stafford Borough is unable to accommodate any unmet housing need from Newcastle-under-Lyme. The parties also agree that Stafford Borough has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.

Economy

- 4.5 The parties agree that Stafford Borough and Newcastle-under-Lyme form distinct functional economic areas through the EHDNA and HENA.
- 4.6 Overall, the HENA identifies a projected employment land requirement of a minimum of 63 hectares over the plan period 2020 – 2040. This is balanced

against employment land supply of approximately 43 hectares as of March 2023.

- 4.7 The parties agree that, following engagement on this matter, that there has been no request from Stafford Borough to accommodate any unmet employment land need and the Councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Infrastructure / Transportation

- 4.8 The Newcastle-under-Lyme Local Plan, at Regulation 19 stage, will be supported by an Infrastructure Delivery Plan and Strategic Transport Assessment.

Gypsy and Travellers / Travelling Showpeople

- 4.9 Newcastle-under-Lyme has commissioned evidence in the form of an update to its Gypsy and Traveller and Travelling Showperson Needs Assessment (Arc4, 2024). Stafford Borough has published a Gypsy and Traveller Accommodation Assessment in March 2022 (arc4, 2022). The nature of provision means that each individual Council area will meet authority area specific need.
- 4.10 The parties agree that, following engagement on this matter, that each authority will meet its own Gypsy and Traveller and Travelling Showperson need.

5. Duty-to-Co-operate Agreement

- 5.1 The parties agree that Newcastle-under-Lyme has fulfilled its Duty-to-Co-operate with Stafford Borough Council in respect of the Final Draft Local Plan (2020-2040).
- 5.2 The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

6. Signatories and Governance Arrangements

- 6.1 The two Borough Council's remain committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond.
- 6.2 In terms of governance, the authorities agree:
- that in response to any new evidence / changes in circumstances, informal discussions will occur between the local authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings, with escalation of matters to Councillor level where necessary;

- that this SoCG will be reviewed when required, including adding additional issues that may be identified through the process of forming the local plan;
- to continue to work in the spirit of collaboration, whilst acknowledging each others' timetables and timescales; and
- To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Newcastle-under-Lyme Borough Council	Newcastle-under-Lyme Borough Council
Name: Craig Jordan	Name: Cllr Andrew Fear
Position: Service Director Planning	Position: Portfolio Holder (Strategic Planning)
Date Agreed: 12/11/24	Date Agreed: 12/11/24
Stafford Borough Council	Stafford Borough Council
Name: Dean Piper	Name: Cllr Ant Reid
Position: Head of Economic Development & Planning	Position: Portfolio Holder (Economic Development and Planning)
Date Agreed: 7/11/24	Date Agreed: 7/11/2024



Mr A Clarke
Planning Policy Manager
Castle House
Barracks Road
Newcastle-under-Lyme
ST5 1BL

CONTACT	Alex Yendole
DIRECT DIAL	[REDACTED]
EMAIL	[REDACTED]
OUR REF	2022 DTC Stafford2
YOUR REF	AY/766
DATE	3 April 2023

By post and e-mail

Dear Mr Clarke

Re: Duty to Co-operate, NUL unmet housing need

Thank you for the letter to Stafford Borough Council (dated 5 December 2022) from Jemma Marsh on behalf of Newcastle under Lyme Borough Council relating to unmet housing need and assistance from Stafford Borough Council. As I understand it your Local Plan 2020-2040 is proposing a total housing requirement of 7,000 dwellings. With a focus on sustainable locations and an updated evidence base, to be published alongside the Draft Plan later this year, the current 'working assumption' shortfall amounts to 1,816 dwellings.

Following receipt of the letter on 5 December 2022 two Duty to Co-operate meetings have taken place between officers of Newcastle under Lyme and Stafford Borough Councils on 12 January 2023 and 8 March 2023. In the context of these meetings please accept this letter as a formal response to the requests made in your letter.

At this time Stafford Borough Council are not in a position to assist your authority in meeting the unmet housing shortfall of Newcastle under Lyme Borough Council due to the Stafford Borough Local Plan 2020-2040 being in the early stages of plan-making, having recently completed the Regulation 18 consultation. It is also noted that the functional linkages, as reflected by the separate housing market areas of our two authorities together with current transport connectivity, are less prominent than with other areas.

Should you wish to discuss this matter further please do not hesitate to contact me to arrange a further meeting.

Yours sincerely,

[REDACTED]

Alex Yendole
Strategic Planning & Placemaking Manager

STATEMENT OF COMMON GROUND BETWEEN NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL

1. Introduction

- 1.1 This statement of common ground (SOCG) has been prepared by Newcastle-under-Lyme Borough Council and Staffordshire Moorlands District Council in relation to the Newcastle-under-Lyme Borough Council Final Draft Local Plan (at Submission Stage). It reflects the position between the two parties on a number of strategic matters and shared issues.
- 1.2 The purpose of the Statement is to document the strategic cross boundary matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and if appropriate those matters where work is ongoing to resolve differences. The Statement is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.
- 1.3 The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Newcastle-under-Lyme Local Plan 2020-2040.

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Staffordshire Moorlands District Council.
- 2.2 This is a statement of common ground between the parties. The statement provides a record of officer discussions and how far this has gone towards resolving cross boundary issues. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.
- 2.3 A draft SOCG was published alongside the consultation on the Final Draft Local Plan, at Regulation 19 stage. No representations were received from Staffordshire Moorlands District Council to the consultation on the Final Draft Local Plan (at Regulation 19 stage)
- 2.4 Formal approval of the SOCG has been made by the following Officers and Members
 - Newcastle-under-Lyme Borough Council, Service Director (Planning), Craig Jordan
 - Newcastle-under-Lyme Borough Council, Portfolio Holder (Strategic Planning), Cllr Andrew Fear
 - Staffordshire Moorlands District Council

3. Relevant Local Authorities and Geography

- 3.1 Staffordshire Moorlands District Council and Newcastle-under-Lyme Borough Council are adjoining administrative areas fall within the County of Staffordshire. The location of the two authorities are identified in the map below:-

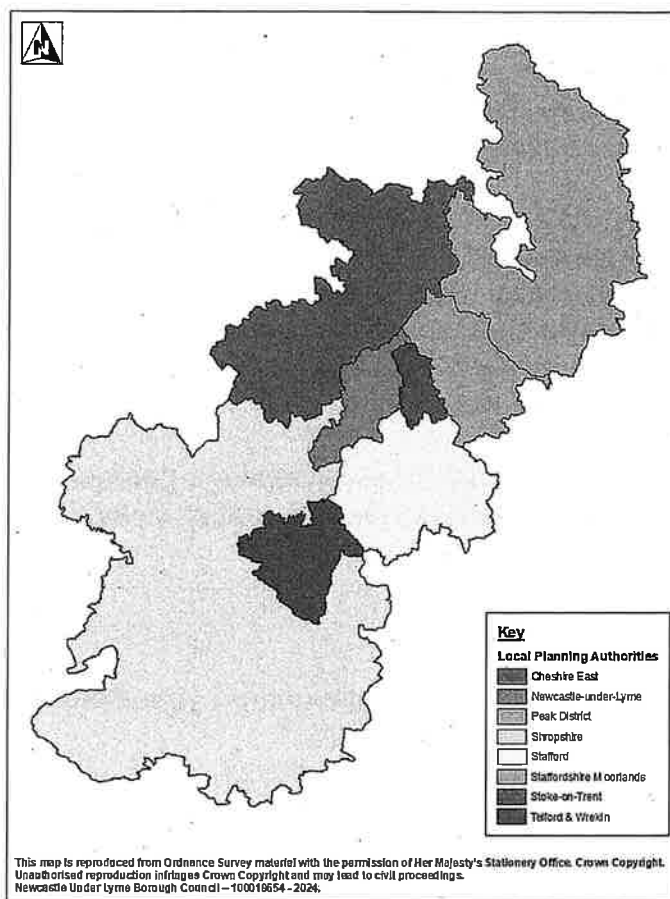


Figure 1: Newcastle-under-Lyme Borough in Context

- 3.2 The Staffordshire Moorlands Local Plan was adopted in 2020 and sets out the Council's vision and strategy for the district until 2033. The Local Development Scheme anticipates a review of the Local Plan in 2025, following the initial assessment if an update to the Local Plan is required, then the adoption of an update to the Plan is not anticipated until the summer of 2028. The Local Development Scheme can be viewed here:- <https://www.staffs Moorlands.gov.uk/article/3488/Local-Development-Scheme>
- 3.3 Between 2013 & 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. The Borough Council consulted on Strategic Issues and Options in 2021/22 and the First Draft Local Plan in the summer of 2023. The Local Development Scheme for Newcastle-under-Lyme Borough Council can be accessed

here: <https://www.newcastle-staffs.gov.uk/planning-policy/local-development-scheme>

- 3.4 Given the respective timescales for the preparation of local plan documents, this SOCG focuses on those issues relevant to Newcastle-under-Lyme Borough Council Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Staffordshire Moorlands District Council at an appropriate time in its preparation process. However, Duty-to-Co-operate discussions will continue as both Local Plans documents progress.

4. Strategic Matters and Record of Agreement

Housing

- 4.1 The parties agree that Staffordshire Moorlands District Council and Newcastle-under-Lyme form distinct housing market areas.
- 4.2 Newcastle-under-Lyme Borough Council has prepared a Housing and Economic Needs Assessment (HENA) (Turley's, 2024). Using Government's standard methodology, the report calculates a local housing need of some 347 dwellings per annum (which equates to 6,940 dwellings over the Plan period (2020-2040).
- 4.3 In accordance with the National Planning Policy Framework and Planning Practice Guidance, the HENA update has considered if there are circumstances which justify setting the local plan housing requirement above LHN (as derived from the standard method). In relation to the local plan economic strategy (and associated population growth), projected employment land requirements and affordable housing, there is justification in setting the housing requirement above LHN. The housing requirement is therefore 400 dwellings per annum (8,000 dwellings over the Plan period (2020-2040).
- 4.4 The parties agree that following engagement on this matter, that Staffordshire Moorlands District Council is unable to accommodate any unmet housing need from Newcastle-under-Lyme. The parties also agree that Staffordshire Moorlands District Council has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.

Economy

- 4.5 The parties agree that Staffordshire Moorlands District Council and Newcastle-under-Lyme form distinct functional economic areas.
- 4.6 Overall, the HEDA identifies a projected employment land requirement of circa 83 hectares over the plan period 2020 – 2040. This is balanced

against employment land supply of approximately 43 hectares as of March 2023.

- 4.7 The parties agree that following engagement on this matter, that there has been no request from Staffordshire Moorlands District Council to accommodate any unmet employment land need and the councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Infrastructure / Transportation

- 4.8 The Newcastle-under-Lyme Local Plan, at Regulation 19 stage, will be supported by an Infrastructure Delivery Plan and Strategic Transport Assessment. Further engagement may take place following consultation on the Regulation 19 Local Plan on these matters and will be updated in subsequent versions of the SOCG.

Gypsy and Travellers / Travelling Showpeople

- 4.9 Newcastle-under-Lyme has commissioned evidence in the form of an update to its Gypsy and Traveller and Travelling Showperson Needs Assessment (Arc4, 2024). The status of the respective Local Plans and nature of provision means that each individual Council area will meet authority area specific need.
- 4.10 The parties agree that, following engagement on this matter, that each authority will meet its own Gypsy and Traveller and Travelling Showperson need.

5. Duty-to-Co-operate Agreement

- 5.1 The parties agree that Newcastle-under-Lyme has fulfilled its Duty-to-Co-operate with Staffordshire Moorlands District Council in respect of the Final Draft Local Plan (2020-2040).
- 5.2 The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

6. Signatories and Governance Arrangements

- 6.1 The Borough Council's remain committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond.
- 6.2 In terms of governance, the authorities agree:
- that in response to any new evidence / changes in circumstances, informal discussions will occur between the local authorities on the cross-boundary,

issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Councillor level where necessary;

- that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of forming the local plan;
- to continue to work in the spirit of collaboration, whilst acknowledging each other's' timetables and timescales; and
- To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Newcastle-under-Lyme Borough Council	Newcastle-under-Lyme Borough Council
Name: Craig Jordan	Name: Cllr Andrew Fear
Position: Service Director Planning	Position: Portfolio Holder (Strategic Planning)
Date Agreed: 10/12/24	Date Agreed: 10/12/24

Staffordshire Moorlands District Council	Staffordshire Moorlands District Council
Name: Andrew Stokes	Name: Cllr. Darren Price
Position: Chief Executive	Position: Deputy Leader of the Council - Regeneration & Planning
Date Agreed: 28/11/2024	Date Agreed: 28/11/2024

Dealt with by: Holly Jones

Our Ref: DTC/Newcastle

Direct Dial: [REDACTED]

Your Ref:

Date: 13 March 2023

Jemma March
Planning Policy
Castle House
Barracks Road
Newcastle under Lyme
ST5 1BL

Dear Jemma,

Re: Duty to Co-operate, NUL unmet housing need

Thank you for the letter addressed to Mark James dated 5 December 2022. I would like to start by apologising for the lengthy delay in responding to you. Please note that Mark James has now left the two authorities and, pending recruitment of a permanent replacement, I will be acting in the interim and I would be grateful if you would update your records accordingly.

I have had an opportunity to review the letter and reflect on our recent meeting regarding the situation that you find yourselves with respect to not being able to meet your identified housing needs.

Under the current framework, Staffordshire Moorlands, as a neighbouring authority, will consider the potential to help meet some of this need, but the appropriate route through which to do this is through the plan making process.

The planning policy team cover both Staffordshire Moorlands and High Peak Borough Council and resource is currently focused on the review of the High Peak Local Plan which is at a very early stage. Staffordshire Moorlands adopted its Local Plan in September 2020 and the review of this plan will not commence for another couple of years. At this point in time we cannot advise whether we will be able to accommodate any housing need.

I note that you have not yet sought to look at sites within your Green Belt to accommodate your housing need. The relationship and geography of our two

authorities around Stoke-on-Trent is such that the land closest to our boundaries is within Green Belt within our administrative area. If we are to help meet some of your unmet housing need in the future it remains the view that the most appropriate place to do would be as close as possible to where the need arises, though this would likely necessitate in us looking at Green Belt release within our administrative area and it is questioned whether to do so in advance of your own through assessment would be logical.

We are happy to continue this dialogue and once we embark upon a review of the Staffordshire Moorlands Local Plan, we would be make an assessment of the potential to accommodate any unmet housing needs in accordance with the duty to cooperate should this still be an issue.

I hope the above is helpful and look forward to meeting you again soon.

Yours sincerely

Holly Jones
Planning Policy Adviser

STATEMENT OF COMMON GROUND BETWEEN NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND SHROPSHIRE COUNCIL

1. Introduction

- 1.1 This statement of common ground (SOCG) has been prepared by Newcastle-under-Lyme Borough Council and Shropshire Council in relation to the Newcastle-under-Lyme Borough Council Final Draft Local Plan (at Submission Stage). It reflects the position between the two parties on a number of strategic matters and shared issues.
- 1.2 The purpose of the Statement is to document the strategic cross boundary matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and if appropriate those matters where work is ongoing to resolve differences. The Statement is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.
- 1.3 The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Newcastle-under-Lyme Local Plan 2020-2040.

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Shropshire Council.
- 2.2 This is a statement of common ground between the parties. The statement provides a record of officer discussions and how far this has gone towards resolving cross boundary issues.. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.
- 2.3 A draft SOCG was published alongside the consultation on the Final Draft Local Plan, at Regulation 19 stage. Ultimately, no representations to the consultation on the Final Draft Local Plan were considered necessary by Shropshire Council.
- 2.4 Formal approval of the SOCG has been made by the following Officers and Members.
 - Newcastle-under-Lyme Borough Council, Service Director (Planning), Craig Jordan
 - Newcastle-under-Lyme Borough Council, Portfolio Holder (Strategic Planning), Cllr Andrew Fear
 - Shropshire Council, Planning Policy and Strategy Manager, Eddie West

3. Relevant Local Authorities and Geography

- 3.1 The two authorities adjoin each other. Shropshire is a unitary authority. Newcastle-under-Lyme is a Borough Council in the County of Staffordshire. The location of the two authorities are identified in the map below:-

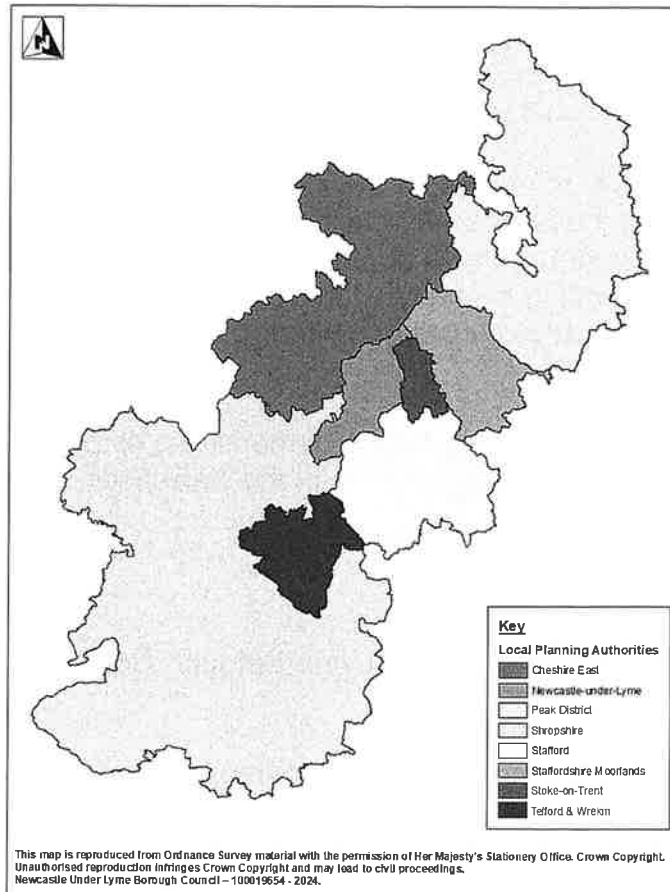


Figure 1: Newcastle-under-Lyme Borough in Context

- 3.2 Shropshire Council is currently at an advanced stage of a Local Plan Review. Specifically, the draft Shropshire Local Plan (2016-2038) is currently undergoing public examination. Newcastle-under-Lyme Borough Council and Shropshire Council have a signed statement of common ground in respect of the draft Shropshire Local Plan and associated plan making process. The Local Development Scheme for Shropshire can be accessed here:- [Local Development Scheme \(LDS\) | Shropshire Council](#)
- 3.3 Between 2013 & 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. The Borough Council consulted on Strategic Issues and Options in 2021/22 and the First Draft Local Plan in the summer of 2023. The Local Development Scheme for Newcastle-under-Lyme Borough Council can be accessed

here:- <https://www.newcastle-staffs.gov.uk/planning-policy/local-development-scheme>

- 3.4 Given the respective timescales for the preparation of local plan documents, this SOCG focuses on those issues relevant to Newcastle-under-Lyme Borough Council Local Plan. A separate SOCG has been prepared for the draft Shropshire Local Plan. However, Duty-to-Co-operate discussions will continue as both Local Plans documents progress.

4. Strategic Matters and Record of Agreement

Housing

- 4.1 The parties agree that Shropshire Council and Newcastle-under-Lyme form distinct and separate housing market areas.
- 4.2 Newcastle-under-Lyme Borough Council has prepared a Housing and Economic Needs Assessment (HENA) (Turley's, 2024). Using Government's standard methodology, the report calculates a local housing need of some 347 dwellings per annum (which equates to 6,940 dwellings over the Plan period (2020-2040).
- 4.3 In accordance with the National Planning Policy Framework and Planning Practice Guidance, the HENA update has considered if there are circumstances which justify setting the local plan housing requirement above LHN (as derived from the standard method). In relation to the local plan economic strategy (and associated population growth), projected employment land requirements and affordable housing, there is justification in setting the housing requirement above LHN. The housing requirement is therefore 400 dwellings per annum (8,000 dwellings over the Plan period (2020-2040).
- 4.4 The parties agree that following engagement on this matter, that Shropshire is unable to accommodate any unmet housing need from Newcastle-under-Lyme. The parties also agree that Shropshire has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.

Economy

- 4.5 The parties agree that Shropshire Council and Newcastle-under-Lyme form distinct and separate functional economic market areas.
- 4.6 Overall, the HENA for Newcastle-under-Lyme Borough Council identifies a projected employment land requirement of a minimum of 63 hectares over the plan period 2020 – 2040. This is balanced against employment land supply of approximately 43 hectares as of March 2023.

- 4.7 The parties agree that following engagement on this matter, that there has been no request from Shropshire to accommodate any unmet employment land need and the councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Infrastructure / Transportation

- 4.8 The Newcastle-under-Lyme Local Plan, at Regulation 19 stage, will be supported by an Infrastructure Delivery Plan and Strategic Transport Assessment. The parties agree to ongoing discussions regarding transport and infrastructure matters.

Gypsy and Travellers / Travelling Showpeople

- 4.9 Newcastle-under-Lyme has commissioned evidence in the form of an update to its Gypsy and Traveller and Travelling Showperson Needs Assessment (Arc4, 2024). The status of the respective Local Plans and nature of provision means that each individual Council area will meet authority area specific need.
- 4.10 The parties agree that, following engagement on this matter, that each authority will meet its own Gypsy and Traveller and Travelling Showperson need.

5. Duty-to-Co-operate Agreement

- 5.1 The parties agree that Newcastle-under-Lyme has fulfilled its Duty-to-Co-operate with Shropshire Council in respect of the Final Draft Local Plan (2020-2040).
- 5.2 The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

6. Signatories and Governance Arrangements

- 6.1 The Council's remain committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond.
- 6.2 In terms of governance, the authorities agree:
- that in response to any new evidence / changes in circumstances, informal discussions will occur between the local authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Councillor level where necessary;
 - that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of forming the local plan;
 - to continue to work in the spirit of collaboration, whilst acknowledging each other's' timetables and timescales; and

- To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Newcastle-under-Lyme Borough Council	Newcastle-under-Lyme Borough Council
Name: Craig Jordan	Name: Cllr Andrew Fear
Position: Service Director (Planning)	Position: Portfolio Holder (Strategic Planning)
Date Agreed: 25/11/2024	Date Agreed: 26/11/24
[REDACTED]	[REDACTED]

Shropshire Council
Name: Edward West
Position: Planning Policy and Strategy Manager
Date Agreed:- 18/11/2024
[REDACTED]

Statement of Common Ground between Shropshire Council and Newcastle-under-Lyme Borough Council

Date: August 2021

1. Introduction

- 1.1. The National Planning Policy Framework (2019) (NPPF), specifies that Local Planning Authorities are *“under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*¹.
- 1.2. The NPPF also specifies that *“in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”*².

2. Purpose

- 2.1. This Statement of Common Ground (SoCG) has been produced to support the Shropshire Council Local Plan Review (2016-2038). Newcastle-under Lyme Borough Council are at an earlier stage of plan preparation on their Local Plan Review, and are due to consult on an Issues and Options paper in autumn 2021. It has therefore been agreed that it is appropriate to consider any further strategic cross boundary issues to support the Newcastle-under-Lyme Local Plan Review as part of a separate SoCG at an appropriate time in their plan preparation timetable. This SoCG sets out how Shropshire Council and Newcastle-under-Lyme Borough Council have positively engaged in order to fulfil the Duty to Cooperate requirements in relation to the Shropshire Council Local Plan Review (2016-2038).

3. Scope

- 3.1. The National Planning Practice Guidance (NPPG) provides details on the scope of a SoCG, which can be summarised as follows:
 - The plan-making authorities responsible for joint working detailed in the statement;
 - A description and map of the administrative areas covered by the statement, and a brief justification for these area(s);
 - The key strategic matters being addressed by the statement;
 - Governance arrangements for the cooperation process;
 - If applicable, the housing requirements (if known) within the area covered by the statement;
 - Distribution of needs or the process for agreeing distribution of needs (including whether there is and the distribution of unmet needs);
 - A record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
 - Any additional strategic matters to be addressed by the statement which have not already been addressed.

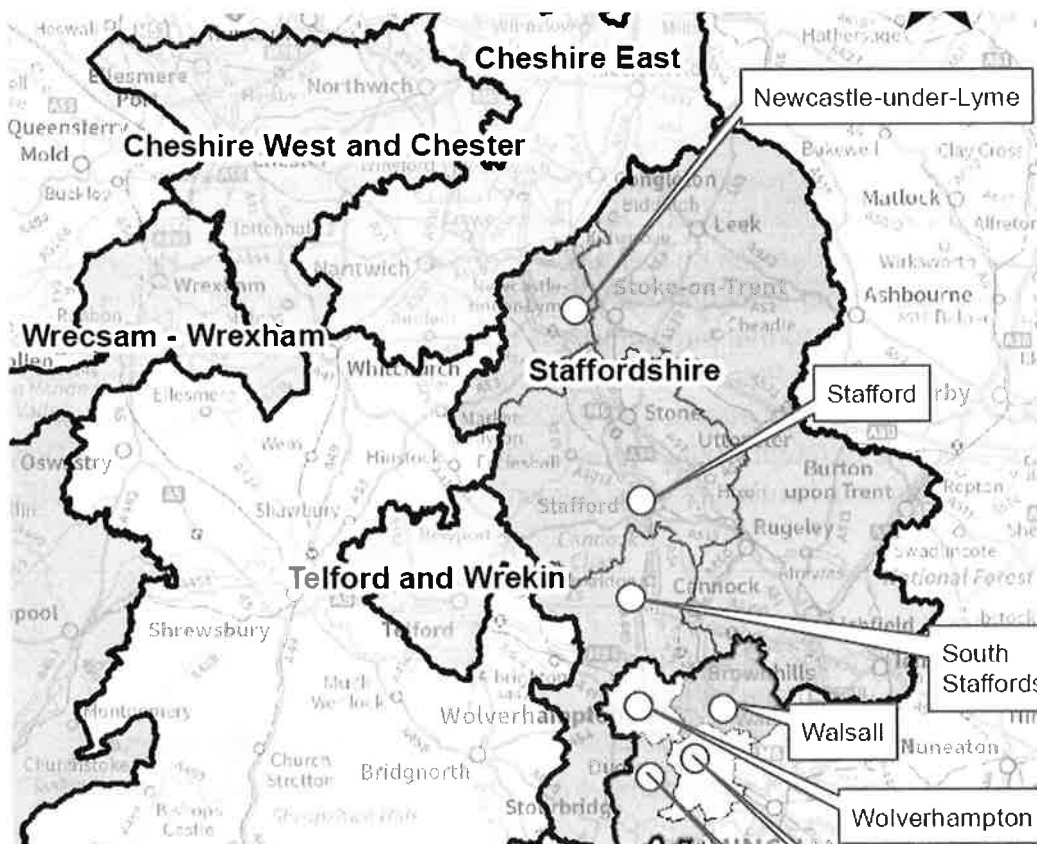
¹ MHCLG, (2019), NPPF – Paragraph 24

² MHCLG, (2019), NPPF – Paragraph 26

- 3.2. The NPPG also recognises that *“The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites”³.*

4. Relevant Local Authorities and Geography

- 4.1. This SoCG has been prepared jointly by Shropshire Council and Newcastle-under-Lyme Borough Council. As neighbouring Local Planning Authorities, it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.
- 4.2. The below map illustrates the location of Shropshire Council and Newcastle-under-Lyme Borough Council:



5. Duty to Cooperate

Shropshire Council Local Plan Review

- 5.1. The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with adopted formal Neighbourhood Plans. On completion of the review process, the Core Strategy and SAMDev Plan documents will be replaced by the ‘Shropshire Local Plan’ (2016-2038) document (with the exception of any saved policies), supported by any adopted formal Neighbourhood Plans.

³ MHCLG, (2019), NPPG – Plan Making, Paragraph: 011 Reference ID: 61-011-20190315

- 5.2. The Shropshire Local Plan will include strategic and detailed policies, together with site allocations for a Plan period 2016 to 2038.
- 5.3. There has been ongoing and active engagement between Shropshire Council and Newcastle-under-Lyme throughout the Shropshire Council Local Plan Review. Specifically:
- Duty to Cooperate discussions have occurred at appropriate times during the Local Plan Review process. These discussions took place within the context of Newcastle-under-Lyme Borough Council preparing a joint Local Plan with Stoke-on-Trent up until December 2020.
 - Newcastle-under-Lyme Borough Council have been consulted during the various 'Regulation 18' Consultations undertaken to inform the Shropshire Local Plan Review. The Local Plan Review consultation periods thus far are as follows:
 - Issues and Strategic Options Consultation – 23rd January 2017 to 20th March 2017.
 - Preferred Scale and Distribution of Development Consultation – 27th October 2017 to 22nd December 2017.
 - Preferred Sites Consultation – 29th November 2018 to 8th February 2019.
 - Strategic Sites Consultation – 1st July 2019 to 9th September 2019.
 - Regulation 18: Pre-Submission Draft of the Shropshire Local Plan – 3rd August 2020 – 30th September 2020.
 - Newcastle-under-Lyme Borough Council were also consulted as part of the 'Regulation 19' Consultation undertaken to inform the Shropshire Local Plan Review.
 - Duty to Cooperate discussions have taken place at appropriate times as the Local Plan Review progressed.

Newcastle-under-Lyme Borough Council Local Plan

- 5.4 On 13 January 2021 members of Newcastle-under-Lyme Cabinet resolved to undertake the production of a new Borough Local Plan independent of Stoke-on-Trent City Council. A new Local Development Scheme has been prepared to cover the period 2021-2024, setting out the preparation of the Newcastle-under-Lyme Borough Local Plan. Information on the LDS can be found here https://www.newcastle-staffs.gov.uk/sites/default/files/IMCE/Planning/Local%20Development%20Scheme%202021-2024_0.pdf

6. Key Strategic Matters

Housing Market Areas

- 6.1. The Shropshire Council area is considered to represent a self-contained housing market area (HMA).
- 6.2. Similarly the Newcastle-under-Lyme Borough Council area comprises its own Housing Market Area although there are overlapping HMAs and strong migration links to the north and south.
- 6.3. It is acknowledged that the duty to cooperate is not restricted to just Local Planning Authorities within the same HMA. As such both Local Authorities continue to liaise closely in accordance with the Duty to Cooperate.

Housing Need and Requirement: Shropshire Council

- 6.4. Using Government's standard methodology, in 2020, Shropshire Council calculated a Local Housing Need (LHN) which applies to both the Local Planning Authority area and the Shropshire Council housing market area of some 1,177 dwellings per annum (equating to 25,894 dwellings over the 22 year plan period from 2016-2038). The assessment of need will be kept under review. Shropshire Council is proposing to meet the entirety of its LHN.
- 6.5. Shropshire Council currently understands that evidence prepared to inform the Local Plan Review being undertaken for the Association of Black Country Authorities (ABCA) indicates a significant unmet housing and employment land need within the Black Country, which forms part of the GBBCHMA, although the exact extent of these unmet has not yet been fully quantified through the Black Country's plan review. However, the NPPF is clear that strategic cross-boundary matters should be "dealt with rather than deferred", so as a result of Duty to Cooperate discussions with ABCA, Shropshire Council is proposing to contribute towards meeting unmet housing and employment land needs understood to be arising in the Black Country. Specifically, Shropshire Council is proposing to contribute around 1,500 dwellings and around 30ha of employment land towards unmet needs arising in the Black Country. Rather than identifying specific sites to achieve these contributions, they will form part of the wider housing and employment land requirements for Shropshire.

Green Belt: Shropshire Council

- 6.6. In order to achieve a sustainable pattern of development, Shropshire Council is proposing to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work. Specifically, the Local Plan Review intends to direct the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support it. However, it also allows for appropriate levels of development within rural areas, to support the longer-term sustainability of rural communities.
- 6.7. The eastern part of Shropshire is located within the West Midlands Green Belt. To inform the ongoing Local Plan Review, Shropshire Council has undertaken a Green Belt review. Whilst most additional development is proposed in locations outside the Green Belt, the strategic economic importance of the eastern part of the County, particularly the M54/A5 corridor, is a significant consideration. Impacts on longer term sustainability of Green Belt settlements due to constraints on their ability to meet their local development requirements have also been identified. There is also a need to facilitate the long-term sustainability of the occupiers of the RAF Cosford site, including the Midlands Air Ambulance Charity. As such a level of Green Belt release is proposed within the ongoing Local Plan Review.
- 6.8. In November 2019 Newcastle-under-Lyme Borough Council wrote to Shropshire Council requesting the Council give consideration to accepting some cross boundary housing needs, within the context of exploring all available options to the potential release of Green Belt. Shropshire Council responded to this request in April 2020, indicating that the Council were not able to accommodate any cross boundary development needs from Newcastle-under-Lyme.
- 6.9. Shropshire Council wrote to Newcastle-under-Lyme Borough Council in February 2020 requesting the Council give consideration to accommodate an element of Shropshire's

housing needs, and in particular in relation to the emerging Green Belt development requirements relating to the sustainable growth requirements of a number of specific settlements Newcastle-under-Lyme Borough Council responded to this request in April 2020, indicating the Authority were unable to accommodate any housing needs from Shropshire within their area.

7. Other Strategic Matters

Gypsies and Travellers: Shropshire Council

- 7.1. Shropshire Council has finalised an updated Gypsy and Traveller accommodation assessment (GTAA 2019). The updated GTAA refines the previously published GTAA (2017) by updating site information and considering public site management data to better understand and evidence site capacity and pitch turnover. Unauthorised encampment activity is also considered.
- 7.2. The evidence concludes that there is no current strategic requirement for allocation. However, the need to provide a permanent plot for Travelling Showpeople resident on a temporary site in Shropshire and potentially for public transit capacity to support private provision are identified. These requirements are proposed to be directly addressed by the Council, with a planning application for a travelling show persons site currently under consideration. In addition to the intended direct provision, policies within the ongoing Local Plan Review will facilitate the ongoing delivery of sites to meet arising needs. Shropshire thus intends on addressing its own needs for gypsy and traveller provision. There are no significant cross boundary strategic issues identified.

Minerals and Waste

- 7.3. Shropshire Council is engaging separately with Staffordshire County Council as the Mineral and Waste Authority for Staffordshire.

Development in Market Drayton

- 7.4. Market Drayton is located in the North-East of Shropshire, close to the boundary of Newcastle-under-Lyme Borough Council. The town is the fifth largest settlement within the Shropshire Council area and has been identified to act as a Principal Centre within the draft Local Plan. Draft Policy S11.1 of the Draft Local Plan identifies the growth requirements for Market Drayton, being 1,200 dwellings and 35ha of employment land over the plan period 2016-2038. At March 2019, 559 dwellings have either been completed or committed since 2016. A number of moderately scaled housing sites have therefore been proposed for allocation to the north of the A53 in order to deliver the residual housing requirement to 2038. These are detailed in Schedule S11.1 (i) of the draft Local Plan and identified on the Draft Policies Map. In recognition of the existing allocated employment commitments, the draft Local Plan does not seek to allocate any additional employment land to 2038.
- 7.5. At the strategic scale, given their proximity, it is recognised there is some potential for additional cross boundary traffic movements between the two authority areas from development in Market Drayton, although there is no evidence to indicate this would be significant. The strategy for Market Drayton provides for balanced growth incorporating 'saved' employment allocations from the existing SAMDev Plan, in order to support a level of self-containment to reduce the need for out-commuting. In addition, draft Policy DP25 provides the Council's approach to infrastructure provision resulting from new planned development. It states that "new development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead

to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through suitable developer contributions, unless the identified shortfall is being addressed by other means.” To inform the submission of the draft Local Plan a minor modification is proposed to the explanatory text to Draft policy DP25 which states, “It should be noted that consistent with the national CIL Regulations (as amended), CIL funds may be passed to bodies outside the area to deliver infrastructure that will benefit the development of the area”.

Neighbourhood Development Planning

- 7.6. Market Drayton Town Council were preparing a Neighbourhood Development Plan for the Town Council area, which also incorporated land in the three adjoining parishes of Moreton Say, Adderley and Norton in Hales. In 2018 this Neighbourhood Development Plan was subject to the Examination process and was not recommended to proceed to referendum. As a result no further work has taken place on this Neighbourhood Development Plan.
- 7.7. A separate Neighbourhood Development Plan is currently in the early stage of preparation by Moreton Say, Adderley and Norton in Hales Parish Councils, although this has not yet reached its Regulation 14 Draft stage.

8. Matters of Agreement

- 8.1. Shropshire Council intends to meet their identified LHN within their Local Authority area through the Local Plan review up to 2038. The Duty to Cooperate conversations between the two authorities have agreed that neither authority was able to meet any additional need for housing above their own LHN. Shropshire will accommodate its own LHN within its area. It is acknowledged that the context and timeframe for the Newcastle-under-Lyme Local Plan Review has changed recently, and it is therefore appropriate for Newcastle-under-Lyme to review their position regarding the LHN as part of future Duty to Cooperate conversations with adjoining authorities, including Shropshire Council; as they progress their Local Plan Review.
- 8.2. Shropshire Council has explored with Newcastle-under-Lyme Borough Council their ability to sustainably accommodate the development requirements associated with specific settlements/sites within the Green Belt in Shropshire. Through the Duty to Cooperate conversations Newcastle-under-Lyme Borough Council have indicated they are not in a position to accommodate any of Shropshire’s proposed Green Belt release.

9. Matters of Disagreement

- 9.1. There are no matters that Shropshire Council and Newcastle-under-Lyme Borough Council disagree on.

10. Governance Arrangements

- 10.1. Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.
- 10.2. Updating of this SoCG will be linked to key milestones within the Local Plan process for the Local Planning Authorities involved.

11. Conclusions

- 11.1. The parties agree that:

- i) Shropshire Council has fulfilled its Duty to Cooperate with Newcastle-under-Lyme Borough Council.
- ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

12. Signatories

12.1. This SoCG has been agreed and signed by the following:

Shropshire Council	Newcastle-under-Lyme Borough Council
Name:	Name:
Position:	Position:
Date agreed:	Date agreed:
Signature:	Signature:

Appendix 12: E-mail from Shropshire Council

RE: DTC Catch Up - Message (HTML)

FileMessageTell me what you want to do...

IgnoreDeleteReplyReply AllForwardMore

Classification *Descriptor *Markings

Set LabelOptionsMoveRulesActionsMark UnreadCategorizeFollow UpTranslateRelatedSelectZoomSend to OneNoteViva InsightsReport Message

Edward West [REDACTED]Allan Clarke; Greg Macrdechian; Dan Corden

14/04/2023

RE: DTC Catch Up

You forwarded this message on 18/05/2023 10:38.

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dear Allan,

Firstly, apologies for the delay in responding.

I can confirm the minutes of our meeting on 6th March are fine.

With regard to your letter of December 2022, Shropshire Council acknowledges that Newcastle-under-Lyme Borough Council are now embarking on their own Local Plan as the previous joint working with Stoke-on-Trent has discontinued. We also understand that as part of this new plan making process additional evidence is being drafted regarding urban capacity, although at this stage Shropshire has not seen this and therefore is not in a position to comment, although the principle of ongoing Duty to Cooperate conversations is of course supported in order to identify genuinely strategic cross boundary matters.

Turning to the specific issues you are seeking our consideration...

- Shropshire has no evidence at this stage to question the level of housing shortfall in your area or 1,816 dwellings, but as discussed we have not interrogated the evidence behind this;
- Shropshire reiterates the current position with regard to the provision of any assistance already established in previous Duty to Cooperate correspondence between the Authorities, and established through the agreed SoCG (agreed in September 2021) which has informed Shropshire's own Plan making process. This confirms that Shropshire Council is not currently in a position to offer any assistance to accommodate any forecast unmet housing need from the Newcastle-under-Lyme area. This is due to a significant mismatch in the plan making cycle between the Authorities, as well as general concerns about the ability to achieve a genuinely sustainable pattern of development in doing so.

We would of course support continued constructive discussions moving forward, and at this stage we wish you the best in your Plan's continued development.

Kind regards,

Eddie West
Planning Policy and Strategy Manager
Shropshire Council
[REDACTED]

Classifier Label

STATEMENT OF COMMON GROUND BETWEEN NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND STAFFORDSHIRE COUNTY COUNCIL

1. Introduction

- 1.1 This statement of common ground (SOCG) has been prepared by Newcastle-under-Lyme Borough Council and Staffordshire County Council in relation to the Newcastle-under-Lyme Borough Council Final Draft Local Plan (at Submission Stage). It reflects the position between the two parties on a number of strategic matters and shared issues.
- 1.2 The purpose of the Statement is to document the strategic cross boundary matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and if appropriate those matters where work is ongoing to resolve differences. The Statement is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues. The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Newcastle-under-Lyme Local Plan 2020-2040.

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Staffordshire County Council.
- 2.2 This is a statement of common ground between the parties. The statement provides a record of officer discussions and how far this has gone towards resolving cross boundary issues. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.
- 2.3 A draft SOCG was published alongside the consultation on the Final Draft Local Plan, at Regulation 19 stage. Representations were received from the County Council to the Regulation 19 stage.
- 2.4 Formal approval of the SOCG has been made by the following Officers and Members
 - Newcastle-under-Lyme Borough Council, Service Director (Planning), Craig Jordan
 - Staffordshire County Council, James Chadwick, Principal Planning Officer
 - Newcastle-under-Lyme Borough Council, Portfolio Holder (Strategic Planning), Cllr Andrew Fear
 - Staffordshire County Council

3. Relevant Local Authorities and Geography

- 3.1 Newcastle-under-Lyme Borough Council is a Borough Council in the County of Staffordshire.

- 3.2 Staffordshire County Council is responsible for minerals and waste planning alongside matters including transport, education and has other areas of responsibility. Further information on the Minerals and Waste Plans, including information on the Local Development Scheme can be found here:- [Policy - Staffordshire County Council](#)
- 3.3 Between 2013 & 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. The Borough Council consulted on Strategic Issues and Options in 2021/22 and the First Draft Local Plan in the summer of 2023. The Local Development Scheme for Newcastle-under-Lyme Borough Council can be accessed here:- <https://www.newcastle-staffs.gov.uk/planning-policy/local-development-scheme>
- 3.4 Given the respective responsibilities and timescales for the preparation of planning documents, including Minerals and Waste Plans, then this SOCG focuses on those issues relevant to Newcastle-under-Lyme Borough Council Local Plan.

4. Strategic Matters and Record of Agreement

Employment Land

- 4.1 The parties agree that there is a need to allocate employment land in the Borough and that there is a need for at least two strategic employment sites.

Education

- 4.2 The parties agree that following engagement on this matter that the Infrastructure Delivery Plan has been informed by discussions and input from Staffordshire County Council, including with the school organisation team. The IDP lists the known education infrastructure projects at this time.
- 4.3 The parties agree to ongoing discussion regarding education matters.
- 4.4 The parties agree that there is a need for the Borough Council to consider amendments to the Green Belt to accommodate the required extension to Madeley High School, following discussions with the school organisation team.

Transportation

- 4.5 The parties agree that officers from the County Council have been involved in the preparation of the Borough Council's Strategic Transport Assessment.
- 4.6 Discussions have also taken place with regards development management policies, which have informed the Council's Local Plan.

- 4.7 The parties agree to ongoing discussion regarding transport matters.

Infrastructure

- 4.8 The parties agree that officers from the County Council have been consulted on relevant infrastructure matters that have informed the development of the Infrastructure Delivery Plan.
- 4.9 The parties agree that the Borough Local Plan should include a reference to the potential need to increase household waste recycling centre capacity over the Plan period.

Archaeology / Historic Environment

- 4.10 The parties agree that officers from the County Council have been consulted on the Heritage Impact Assessment methodology prepared by Oxford Archaeology.

Flooding and Flood Risk

- 4.11 The parties agree that officers from the County Council have been consulted on the Strategic Flood Risk Assessment prepared to support the Borough Local Plan.

Public Health and Wellbeing

- 4.12 The parties agree that there has been constructive and ongoing discussions on health and wellbeing.

Employment and Skills

- 4.13 The parties agree that there has been constructive and ongoing discussions on Employment and Skills and that the Plan should have regard to the Staffordshire Employment and Skills Framework.

Detailed Policy wording



- 4.14 It is acknowledged that SCC have submitted representations to the Regulation 19 Final Draft Local Plan. The parties agree to continue to engage regarding the content of those representations, but they do not raise strategic cross boundary issues between the parties.

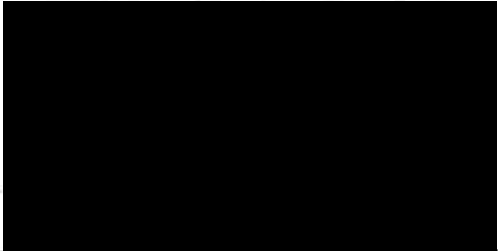
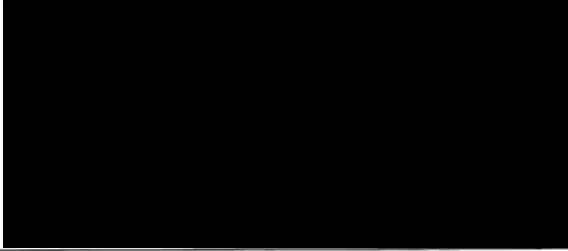
5. Duty-to-Co-operate Agreement

- 5.1 The parties agree that Newcastle-under-Lyme has fulfilled its Duty-to-Co-operate with Staffordshire County Council in respect of the Final Draft Local Plan (2020-2040).
- 5.2 The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

6. Signatories and Governance Arrangements

- 6.1 The Council's remain committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond.
- 6.2 In terms of governance, the authorities agree:
- that in response to any new evidence / changes in circumstances, informal discussions will occur between the authorities, including on any cross-boundary issues referred to in this SoCG, in the form of officer level meetings with escalation of matters to Councillor level where necessary;
 - that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of forming the local plan;
 - to continue to work in the spirit of collaboration, whilst acknowledging each other's' timetables and timescales; and
 - To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Staffordshire County Council	Newcastle-under-Lyme Borough Council
Name: James Chadwick	Name: Craig Jordan
Position: Principal Planning Policy Officer	Position: Service Director - Planning
Date Agreed: 10/12/24	Date Agreed: 10/12/24
	

Staffordshire County Council	Newcastle-under-Lyme Borough Council
Name: Cllr P White	Name: Cllr Andrew Fear
Position: Cabinet Member for Economy and Skills	Position: Portfolio Holder (Spatial Planning)
Date Agreed: 10/12/24	Date Agreed: 10/12/24
	

Allan Clarke

From: Taylerson, Kezia <[REDACTED]>
Sent: 13 December 2024 12:25
To: Allan Clarke
Subject: Historic England ongoing communication

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Dear Allan,

Many thanks for the meeting this morning, and for sending us through the draft copy of the Statement of Common Ground (SofCG), between our two parties.

It was a useful meeting to see where we are and discuss the next steps.

We will respond formally to the draft SofCG, and then please do feel free to come back to us with any comments relating to it.

We look forward to our continued engagement on the SofCG, in due course.

Any questions, please contact us.

Kind regards

Kezia

Kezia Taylerson
Historic Environment Planning Adviser
Midlands



Historic England

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Allan Clarke

From: Leyssens, Andrew <[REDACTED]>
Sent: 13 December 2024 16:39
To: Allan Clarke
Cc: Sarah Hambling
Subject: RE: NUL Local Plan

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Hi Allan

Thank you for your email.

I confirm my agreement to the below points.

Kind regards – Andrew



Andrew Leyssens MRTPI
Planning Manager
Planning, Landscape and Ecology
Asset Management
M: [REDACTED]
unitedutilities.com

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From: Allan Clarke <Allan.Clarke@newcastle-staffs.gov.uk>
Sent: 13 December 2024 14:42
To: Leyssens, Andrew <[REDACTED]>
Cc: Sarah Hambling <[REDACTED]>
Subject: NUL Local Plan

Hi Andrew,

Thank you for your time earlier. As discussed, would it be possible to confirm your agreement to the following:-

- That United Utilities Water Limited and NUL have had meaningful and ongoing engagement on the Local Plan. This will continue following the Local Plan submission for examination.
- That the Level 1 Strategic Flood Risk Assessment has been undertaken in line with relevant guidance in place at the time.
- To note that following comments and engagement received from parties including United Utilities Water Limited, that the Council has engaged JBA consulting to prepare a proportionate level 2 Strategic Flood Risk Assessment on a number of sites. It is agreed that engagement will continue following the completion of that work.

Thanks

Kind Regards

Allan

Allan Clarke

Planning Policy Manager

Newcastle-under-Lyme Borough Council



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Allan Clarke

From: Millband, Emma <[REDACTED]>
Sent: 18 December 2024 16:22
To: Allan Clarke
Cc: Craig Jordan; Davies, Mark
Subject: FW: EA / NUL SOCG statement

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Hi Allan,

Further to your email, we confirm that we are in receipt of a first draft SOCG intended to summarise areas of agreement and areas of ongoing discussions. We have yet to review this but endeavour to do so as soon as possible. We have indicated that the timeframe for doing so is likely to be towards mid-January.

We agree that:

- the EA and NUL have had meaningful engagement on the Local Plan. This is ongoing and will continue following the Local Plan submission for examination.
- the Level 1 Strategic Flood Risk Assessment & Water Cycle Study has been undertaken in line with relevant guidance in place at the time (to the best of my knowledge).

We note that:

- following comments and engagement, the Council has engaged JBA consulting to prepare a proportionate level 2 Strategic Flood Risk Assessment on some sites. Further engagement may be necessary following the completion of that work.

Kind regards

Emma

Emma Millband
Senior Planning Officer
Sustainable Places
Environment Agency West Midlands Area

direct telephone: [REDACTED]

Team email: westmidsplanning@environment-agency.gov.uk



From: Allan Clarke <[REDACTED]>
Sent: 18 December 2024 11:28
To: Millband, Emma <[REDACTED]>; Davies, Mark <[REDACTED]>
[REDACTED]
Cc: Craig Jordan <[REDACTED]>
Subject: RE: EA / NUL Meeting Minutes 28.11.2024

Allan Clarke

From: McLaughlin, Sally <[REDACTED]>
Sent: 18 December 2024 14:32
To: Allan Clarke; Ashdown, Marian
Cc: Craig Jordan
Subject: RE: NUL Local Plan

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Thanks Allan, I can confirm agreement to the following text with regards to the current position

Kind regards Sally

Sally McLaughlin
Senior Officer
Sustainable Development - West Midlands Team
Natural England
Parkside Court, Hall Park Way
Telford, TF3 4LR
www.gov.uk/natural-england



From: Allan Clarke <[REDACTED]>
Sent: 18 December 2024 13:09
To: McLaughlin, Sally <[REDACTED]>; Ashdown, Marian
<[REDACTED]>
Cc: Craig Jordan <[REDACTED]>
Subject: RE: NUL Local Plan

Hi Sally, following our earlier correspondence, I would be grateful for confirmation of agreement to the following text:-

It is agreed that...

- That Natural England and NUL have had meaningful and ongoing engagement on the Local Plan. This will continue following the submission of the Local Plan for examination.
- That following the matters raised by Natural England in their Regulation 19 response, the following activities have taken place, for Air Quality: -
- The Council has provided additional data, including the average annual daily traffic (AADT) for the final suite of sites assessed in the Strategic Transport Assessment at Regulation 19 stage.
- That following the provision of average annual daily traffic data (AADT), there is a requirement to undertake further air quality / emissions work to inform updates to the Habitats Regulations Assessment (where relevant). This will include ongoing and constructive engagement with Natural England
- That the Council has engaged SWECO (for Air Quality Modelling) and Lepus Consulting (in respect of the Habitats Regulations Assessment work)

- That following a meeting on the 18 December 2024, the scope, defined area and list of designated sites for inclusion of the study are agreed (Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI). Alongside broad agreement to the methodology to be employed.
- That there is agreement to ongoing engagement on the outcomes of the study, expected in January 2025
- In respect of Best and Most Versatile Land. The Council has provided a briefing note on their position on Best and Most Versatile Land to Natural England for review and feedback is expected in the new year.
- It is expected that a statement of common ground will be prepared early in the new year, that will summarise areas of agreement and areas of ongoing discussion on the Local Plan. A draft has been prepared and is currently being considered by both parties.

Thanks

Kind Regards

Allan

Allan Clarke
Planning Policy Manager
Newcastle-under-Lyme Borough Council
[REDACTED]

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Allan Clarke

From: Kathryn Simmonite <[REDACTED]>
Sent: 19 December 2024 15:35
To: Allan Clarke
Subject: RE: NUL Local Plan

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Hi Allan

I am content with these bullet points.

Kind regards

Kathryn Simmonite, Spatial Planner

Operations Directorate (Midlands)

National Highways | The Cube | 199 Wharfside Street | Birmingham | B1 1RN

Mobile: + [REDACTED]

Web: www.nationalhighways.co.uk

From: Allan Clarke <[REDACTED]>
Sent: 19 December 2024 15:30
To: Kathryn Simmonite <[REDACTED]>
Subject: NUL Local Plan

Hi Kathryn,

Thank you for your recent e-mail, to which I will respond separately, is it possible to confirm, via e-mail that you are happy with the points below:-

- That National Highways and NUL have had meaningful and ongoing engagement on the Local Plan. This will continue following the Local Plan submission for examination.
- That National Highways have been a member of the steering group during the preparation of the NUL Local Plan Strategic Transport Assessment [ED011]
- That the Borough Council has provided a response following comments and questions received by National Highways to the Regulation 19 version of the Local Plan.
- That discussions are still ongoing regarding any outstanding issues raised by National Highways on the Local Plan in a constructive and ongoing way.
- That a SOCG will be prepared that will summarise areas of agreement and areas of ongoing discussion early in the new year

Thanks,

Kind Regards,

Allan

Allan Clarke
Planning Policy Manager
Newcastle-under-Lyme Borough Council


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Mr A Clarke
Planning Policy Manager
Castle House
Barracks Road
Newcastle-under-Lyme
ST5 1BL

CONTACT	Alex Yendole
DIRECT DIAL	[REDACTED]
EMAIL	[REDACTED]
OUR REF	
YOUR REF	[REDACTED]
DATE	8 October 2024

By e-mail

Dear Mr Clarke

Re: Final Draft Newcastle-under-Lyme Borough Council Local Plan (Regulation 19)

Thank you for the opportunity to respond to the Final Draft Newcastle under Lyme Borough Council Local Plan (Regulation 19) consultation document.

As Stafford Borough is a neighbouring authority to Newcastle under Lyme Borough the vision, strategic options and development strategy will contribute to the overall development of North Staffordshire and therefore may have infrastructure implications for our area, noting that Stafford Borough has a separate Housing Market Area.

Based on the Final Draft Local Plan set out for Newcastle under Lyme Borough, Stafford Borough Council is generally supportive of the vision, strategic objectives and planning for sustainable development. In particular, it is useful to provide a place-specific emphasis to provide more clarity associated with the approach for housing delivery and employment growth, established through a robust evidence base.

It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the Newcastle under Lyme Borough area. On this basis, the Borough Council is supportive of housing and proposed employment growth that meets local needs as an appropriate strategy to ensure future sustainable development by utilising existing and new infrastructure provision whilst maximising the use of brownfield land and minimising impact on the North Staffordshire Green Belt. Nevertheless at this stage Stafford Borough are unable to accommodate additional housing provision from your area.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council has initiated a New Local Plan 2020-2040 to set out the future development strategy beyond the adopted Plan period of 2031, with the Preferred Options consultation completed in December 2022.

The Borough Council would welcome an acknowledgement of this representation and the opportunity to formally sign off the Duty to Co-operate Statement of 10th June 2024 with Newcastle under Lyme Borough Council as part of progressing the Local Plan.

I look forward to hearing from you in due course.

Yours sincerely,



Alex Yendole
Planning Policy Manager