



# Newcastle-under-Lyme Local Plan



**2020 - 2040**  
Issues and Strategic Options

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## Foreword

Welcome to the Newcastle-under-Lyme Borough Council Issues and Strategic Options Paper.

This is the first step towards the adoption of a new Local Plan for the Borough which will help shape development til 2040. The new Plan will provide the key set of policies and site designations that will inform future planning applications ensuring that the best outcomes are achieved through sustainable development.

The purpose of this document is to engage people in a discussion around the direction of the plan in addressing identified needs for housing, jobs provision, protecting the environment and supporting our urban centres and rural communities.

In addition to presenting options around growth, the document offers a range of choices where development needs that cannot be accommodated in the urban area could be accommodated.

As it is recognised that there are challenges ahead with each of these choices, this document and the associated consultation work provides people with a chance to compare each of these options and provide thoughts on suitable ways to proceed in the future.

Following the consultation on these documents, the Council will take the information given to inform the production of the Draft Plan in the second part of 2022 which will be a chance for people to see which sites may be brought forward in the final stage of the Plan.

The Council looks forward to your engagement with this consultation and receiving any constructive comments you may have about the Plan.



Councillor Paul Northcott

Portfolio Holder - Strategic Planning

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# 1 Introduction

**1.1** The Borough Council is committed to ‘growing our people and places’ – a key priority of the Councils Plan which aims to build a strong and sustainable economy to ensure opportunities and support are available to everyone to improve their lives. Having an up-to-date Local Plan in place provides a framework for development of the Borough over the next 20 years.

**1.2** Local Plans are a statutory requirement set by the Government under the Planning and Compulsory Purchase Act 2004 which require Local Authorities to set a development plan for their area. The Borough Council is producing a new Local Plan which sets the vision and framework for how Newcastle-under-Lyme will grow to 2040. The Local Plan sets out targets for the number of homes and jobs to be delivered in the Borough and a spatial strategy to guide development to the most sustainable locations. The Plan will allocate sites for housing and employment to provide certainty on where growth will occur. In addition, the plan will contain local, strategic and detailed planning policies which will be used to help assess planning applications. The Local Plan is based on robust evidence and is delivered through cooperative working with our neighbours and other statutory organisations.

**1.3** The Council consider a new plan presents the opportunity to reflect the aspirations for the Borough and its unique characteristics, will link effectively with Neighbourhood Plans and will be responsive to wider changes in the economy. In summary, creating a new Local Plan for Newcastle-under-Lyme will serve to:

- Reflect the new issues that have arisen since adoption of the Council's current Plan documents
- Provide for the additional new housing and other development that will be required to meet future identified needs
- Establish a Plan period to 2040 in order to ensure that there will be a minimum 15-year time horizon
- Reflect changes to national planning policy and guidance
- Demonstrate sustainable development that helps combat climate change and carbon reduction

## Withdrawal of the Joint Local Plan

**1.4** Between 2013 & 2020 the Borough Council worked jointly with Stoke-on-Trent City Council to produce a Joint Local Plan. The document was subject to three rounds of public consultation during its development, but was not submitted to the Planning Inspectorate for Examination. The Joint Local Plan was not therefore adopted and it does not form part of the development plan for either Council. Whilst the Joint Local Plan has no status, some of the evidence used to inform the plan contains important, relevant information to the two areas and may continue to be used or updated to inform the new Local Plan for Newcastle-under-Lyme.

## Current Development Plan

**1.5** The Development Plan for the Borough currently consists of a number of documents and some selected saved policies. These are as follows:

- Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (Adopted 2009)
- Saved Policies of the Newcastle-under-Lyme Local Plan (Adopted 2003, with saved policies established in 2011)
- Minerals Local Plan for Staffordshire (2015-2030), produced by Staffordshire County Council
- Staffordshire and Stoke-on-Trent waste Local Plan (2010-2026), produced by Staffordshire County Council
- A number of Made Neighbourhood Plans (see below)

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## Neighbourhood Plans

**1.6** Neighbourhood Plans are prepared by the community typically on a Parish basis setting out local planning policies, as well as potentially looking to identify sites for new development. They have to be in line with national and local planning policy, independently examined and then voted upon in a local referendum as to whether or not they should be formally made (i.e. adopted). Once made they become part of the formal Development Plan for the area.

**1.7** The made Neighbourhood Development Plans in the Borough as at the time of publishing the Issues & Options document are:

- Loggerheads Neighbourhood Development Plan (made 15 February 2019)
- Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan (made 21 January 2020)

**1.8** The Council is at present working closely with a number of Parish Councils (listed below) to support them in the Neighbourhood Planning process and it will be important that this collaborative working continues:

- Audley Parish Neighbourhood Development Plan
- Betley, Balterley and Wrinchill Neighbourhood Development Plan
- Kidsgrove Neighbourhood Development Plan
- Keele Neighbourhood Development Plan
- Madeley Neighbourhood Development Plan

## Other Plans & Strategies

**1.9** Partnership working and coordination of strategies are key features of the planning system. The Local Plan will be informed by and, as appropriate, help to deliver the key strategic objectives of a range of sub regional plans and strategies such as the Local Industrial Strategy produced by the StokeStaffs LEP, the Local Transport Plan produced by Staffordshire County Council and the AECOM Climate Change Adaptation & Mitigation Report for Staffordshire County Council and its eight constituent authorities.

## Duty to Cooperate

**1.10** The Local Plan must be prepared in accordance with the duty to cooperate, which sets a legal obligation for the Council and other public bodies to engage constructively, actively and on an ongoing basis on planning issues which affect more than one local planning authority.

**1.11** To meet the duty to cooperate, the Council will need to work with Staffordshire County Council, neighbouring authorities, statutory advisory bodies (the Environment Agency, Natural England, Historic England and Highways England) and other infrastructure providers to ensure that the Local Plan addresses cross-boundary issues and reflects wider strategic priorities, including considering any needs that cannot be met in adjoining areas.

**1.12** The Council continues to participate in cross-boundary planning and this early initial consultation stage provides an opportunity for adjacent local authorities and other stakeholders, to provide their views and identify any strategic issues that they consider ought to be addressed. This could include housing needs, planning for economic growth, addressing the needs for Gypsy's & Travellers and Travelling Showpeople and infrastructure planning & delivery.

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## Infrastructure

**1.13** The provision of infrastructure is integral to creating opportunities for growth, making best use of land and the delivery of sustainable development. It is also fully acknowledged that the location and scale of development potentially has a significant impact on the ability of existing infrastructure to absorb these additional demands.

**1.14** An Infrastructure Baseline Study has been published as part of the evidence base for the Issues and Options document which sets out current known infrastructure and potential constraints to capacity in the Borough. A more detailed Infrastructure Delivery Plan will be prepared alongside the Local Plan, which resulting from dialogue with service providers will identify any improvements to strategic off-site infrastructure provision i.e. transport & utilities, social (e.g. schools), environmental (open space) required to support future development, and help in its coordination, so that the right things are delivered at the right time and in the most efficient way. The Infrastructure Delivery Plan will be published alongside the Publication Draft Plan which is anticipated to be produced in Autumn 2022 and will form part of the evidence base for the Local Plan (see para 1.23).

**1.15** Funding for strategic infrastructure will be met from a variety of resources, including developer contributions, council resources, central government grants and external funding opportunities. Infrastructure within development sites will also be required to make proposals acceptable from a planning perspective.

## Viability

**1.16** Local plans are required to be deliverable and whilst the impacts of development should be mitigated, it is recognised that there has to be consideration of the balance between the policy aspirations of achieving sustainable development and the realities of economic viability. Further work will be undertaken to accompany the Local Plan that assesses its proposals and policies to examine if this balance and our wish to promote & foster sustainable development, not hinder it, has been successfully reached.

## Monitoring

**1.17** Monitoring and review are two key components of the Planning System and the Borough Council will be required to monitor the effectiveness of the Local plan. This will assess progress and the extent to which objectives are being achieved with specific indicators being established within the Local Plan that will set the parameters for performance measures, with the outcomes presented in an updated Annual Monitoring Report.

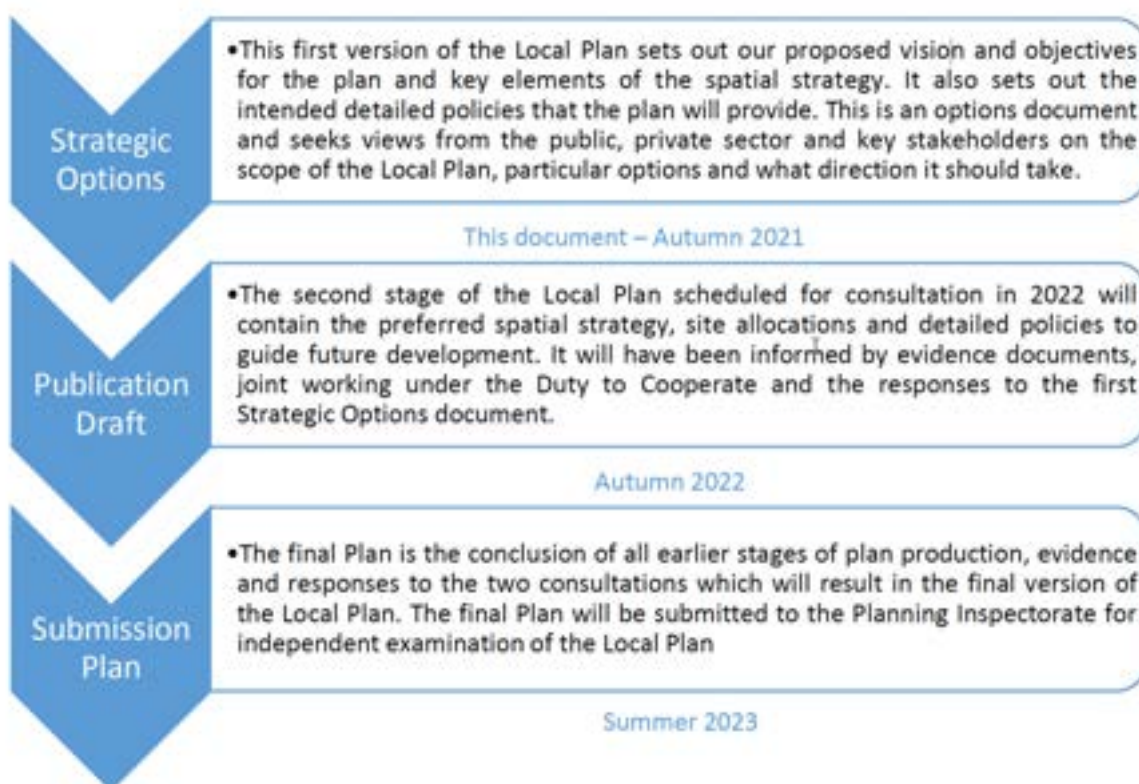


Figure 1 Castle House, Newcastle-under-Lyme



## Stages of development of the Local Plan

**1.18** The Local Development Scheme (LDS) is the project plan for the production of the Local Plan. The LDS was adopted by the Borough Council on 17<sup>th</sup> March 2021. There are three key stages of plan development:



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## **Submission of the Local Plan**

**1.19** An independent planning inspector will consider the soundness and legal compliance of the Local Plan to determine whether the Borough Council can adopt the Local Plan. There is still a six week public consultation on the Local Plan at this stage, however responses cannot shape the plan, only commenting on issues with the soundness of the proposed Local Plan (whether the plan is positively prepared, justified, effective and consistent with national policy as set out in the National Planning Policy Framework).

## **Examination**

**1.20** The Inspector will carefully consider representations made regarding the soundness and legal compliance of the plan and will hold hearing sessions to seek clarity on these issues. Fundamental issues at this stage could result in the Local Plan being withdrawn by the Council or being found unsound by the Inspector. However, in most cases an Inspector will suggest 'modifications' to the Plan which if implemented by the Council enable the Local Plan to be found sound and to be adopted.

## **Adoption**

**1.21** Subject to successful completion of all stages of the production of the Local Plan, the Borough Council will seek to adopt the Local Plan in year 2024 and use it to guide decisions for planning applications until 2040, unless a review is required earlier.

## **Key supporting documents**

**1.22** The Local Plan is supported by a detailed evidence base and a second group of documents that show how the plan has been assessed and progressed.

## **Evidence and Topic Papers**

**1.23** The Local Plan is informed by a suite of evidence base documents on relevant topic areas such as housing, retail and green infrastructure which are used to inform the strategy and planning policies. These will be added to the website as they are developed and are critical to the understanding of what the Borough Council is proposing in the Local Plan. The Borough Council may also produce Topic Papers where these are required to explain decision making where a subject or policy decision requires further explanation. Evidence based documents and Topic Papers can be viewed within the Planning Policy - Local Plan section of Borough Council's website.

## **Sustainability Appraisal**

**1.24** A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process of sustainability appraisal is a requirement under Section 19 of the Planning and Compulsory Purchase Act 2004.

## **Habitats Regulation Assessment**

**1.25** A Habitats Regulations Assessment (HRA) must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a designated European habitats site before deciding whether to undertake, permit or authorise it. Where appropriate, the report sets recommendations for consideration/modification in the development of the Local Plans' policies and proposals to avoid significant adverse effects on designated sites.



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## Policies Map

**1.26** The Policies Map (formerly known as the Proposals Map) displays the policies and proposals spatially on a map of the Borough. It shows where sites are identified for certain uses and presents a visual representation of particular policies.

## We want your opinion on how the Borough should grow

**1.27** The Council wants the Local Plan to reflect the views and needs of the people that live and work in the Borough. It is a plan that influences future growth and therefore it is important we seek as many responses as possible in the early 'shaping' stages of plan development that set out options for growth, development and key planning policies.

**1.28** The Council have scheduled a series of events to explain the purpose of the document and provide question and answer sessions. The Council have also produced an online consultation portal to enable you to make comments on any part of the Strategic Options document. The consultation portal can be found on the Borough Council's website.

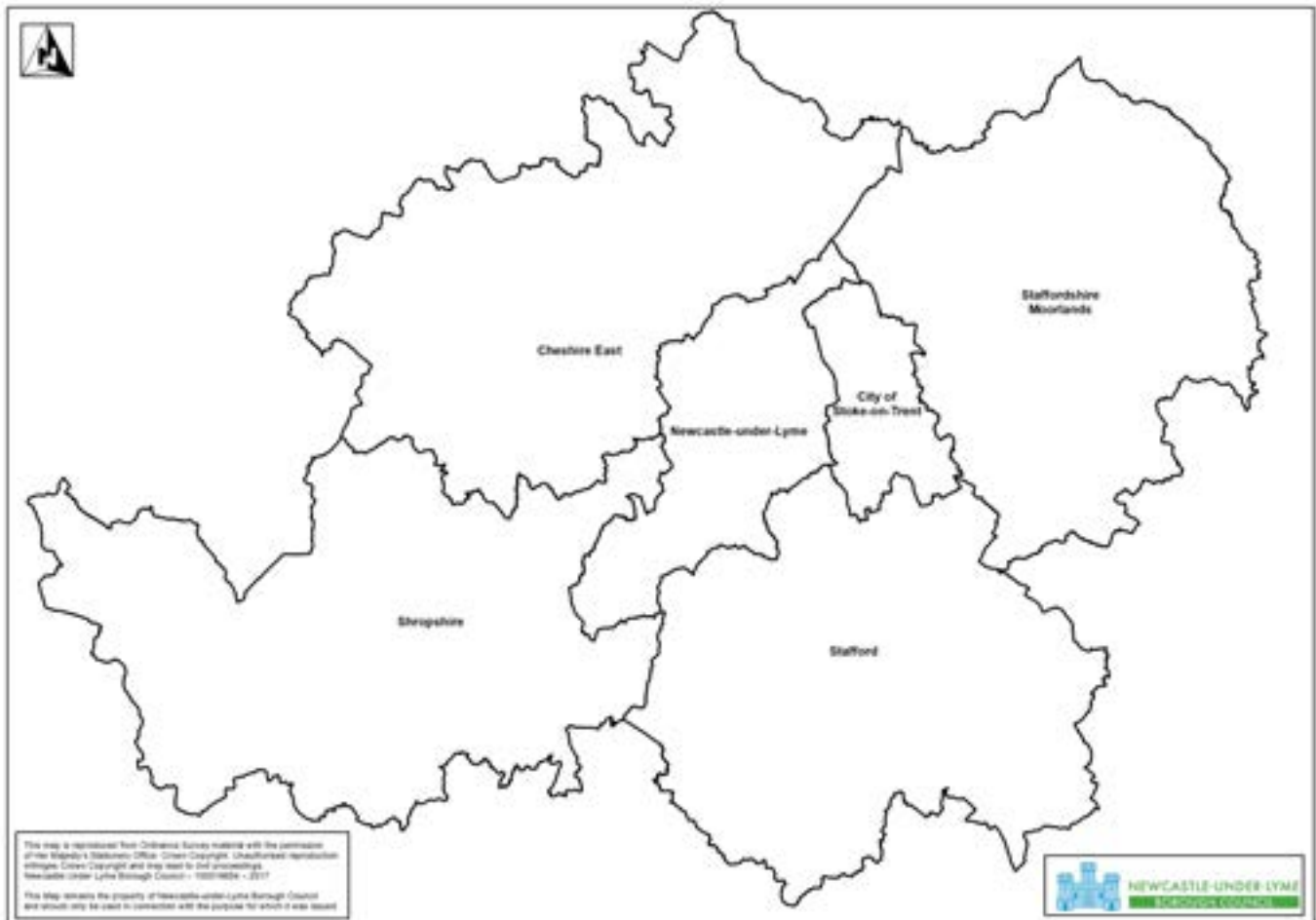
**1.29** **The consultation on this document starts on Monday 1st November 2021 and closes at 5pm on Monday 24th January 2022.**

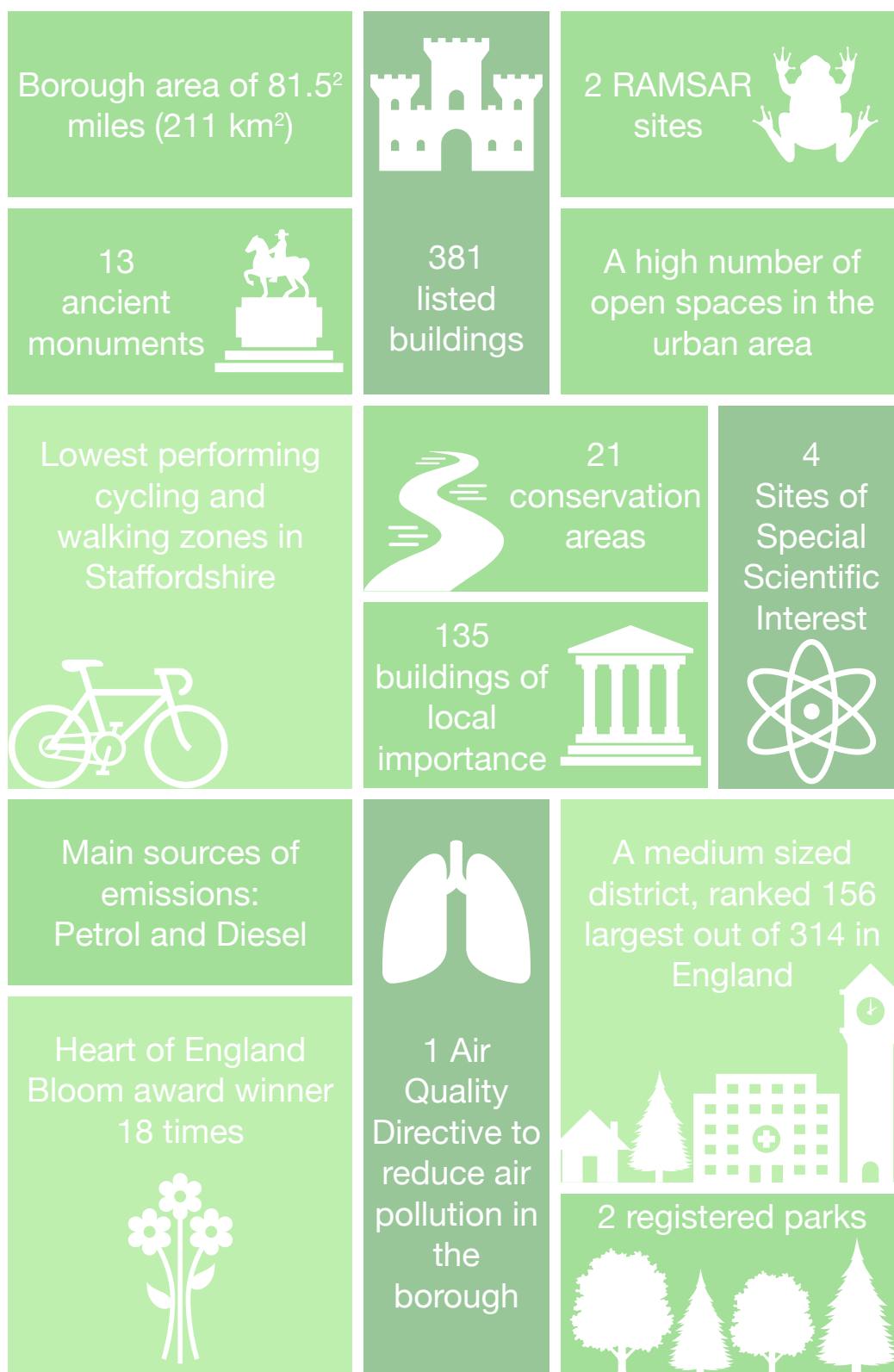
**1.30** Following the consultation, the Council will produce a consultation statement that summarises the responses received and provides an overview of the key messages from the consultation, along with officer's consideration of how these will be addressed.

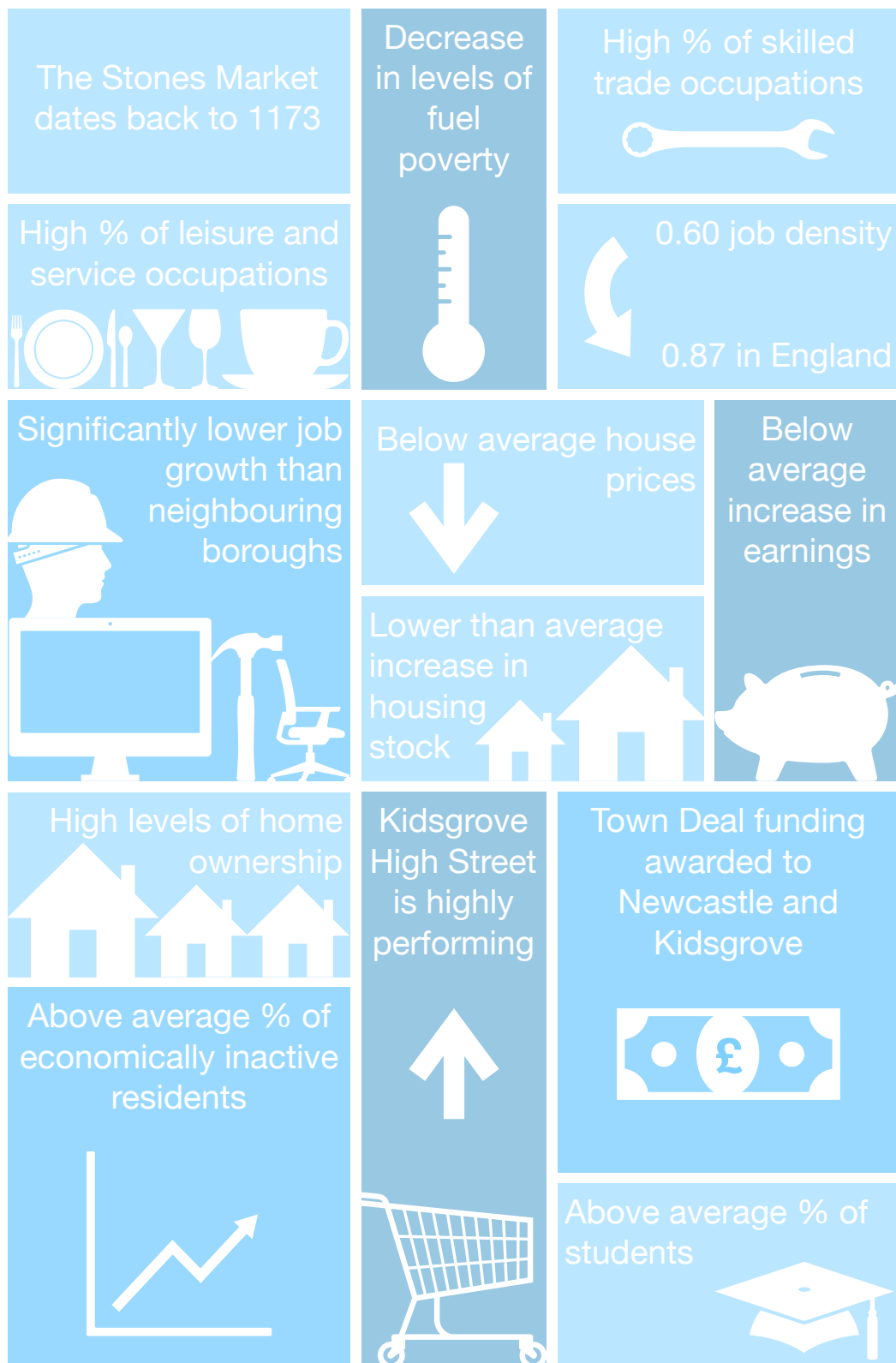
## 2 Context

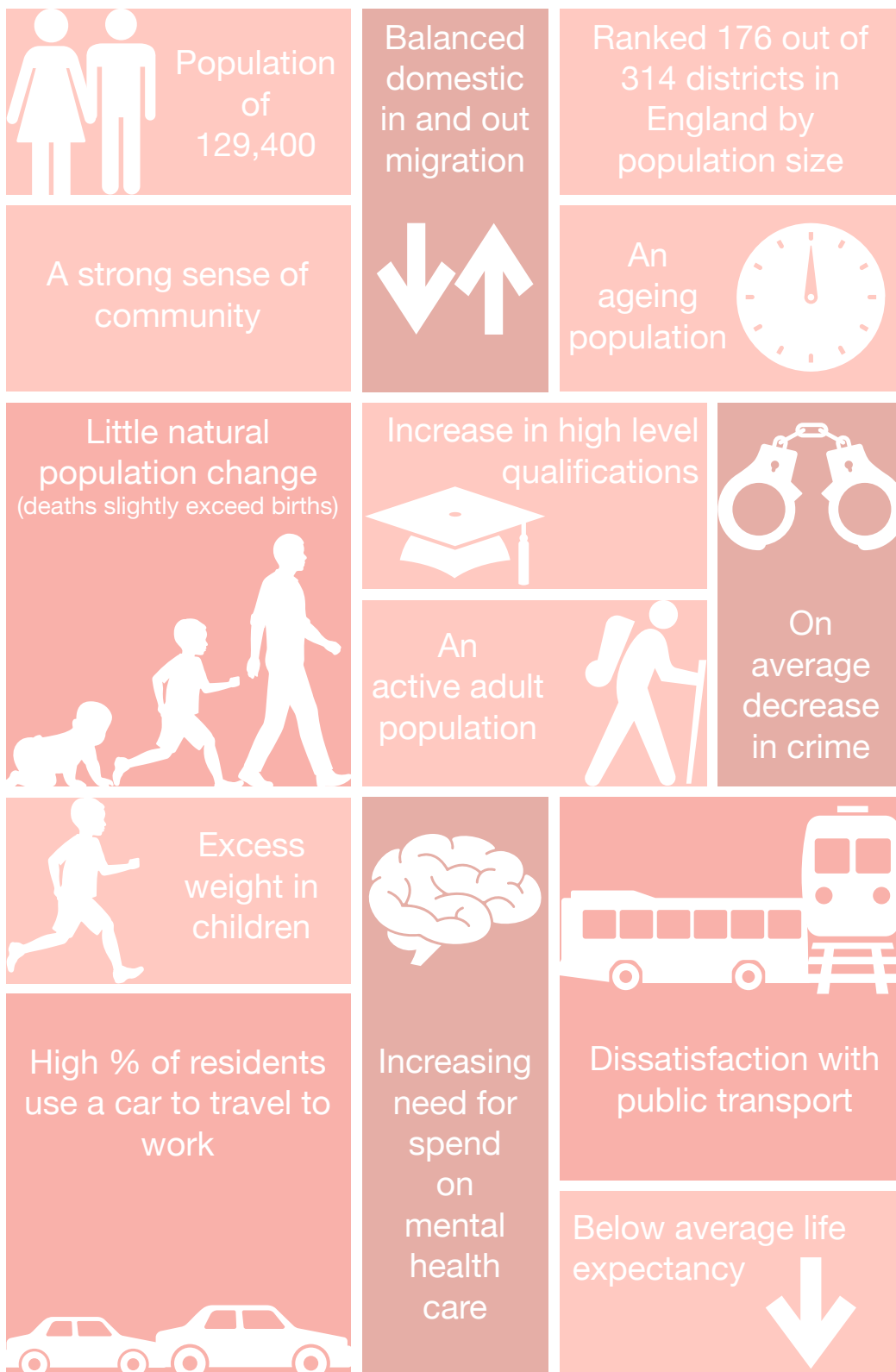
**2.1** This chapter contains a snapshot of the spatial portrait and the challenges and opportunities that will be addressed by the Local Plan. For a more thorough and detailed portrait of the Borough including a range of statistical and spatial data, please see the Sustainability Appraisal Scoping Report which is listed as an evidence document to support the Local Plan.

**Map 1: Locational context of Newcastle-under-Lyme**















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## 3 Vision

**By 2040, the Borough will have delivered sustainable new homes and jobs meeting local needs and providing more opportunities for people. We will have respected and improved the character and distinctiveness of our Staffordshire market towns, villages and rural areas with a particular focus on broadening our network of Neighbourhood Plans.**

**We will have enabled new infrastructure, supported the growth of businesses and our University, whilst preserving and enhancing our natural and built assets and taken action to tackle the impacts of climate change.**

### Vision Statement

**3.1** Place making is at the heart of our Vision, creating development which will conserve and enhance our natural and historic assets, will complement our distinctive towns, local centres and villages as well as foster our sense of community. The Local Plan will set a framework for this, focusing on the issues that matter to local communities and providing a context within which community led planning initiatives, including neighbourhood plans, can flourish and prosper. Through its implementation, the Local Plan will seek to create successful, safe, strong, cohesive and sustainable communities where residents are actively involved in shaping the places where they live. In essence, it will strive to achieve a balanced approach to conserve what makes us special in our urban and rural communities, whilst delivering growth and innovation.

**3.2** The regeneration of town centres and of older parts of towns will help to maximise the use of brownfield land for new development and inspire community confidence in the need for positive change. Town centres will be the primary focus for leisure, retail and cultural facilities, making them into real hearts for their communities. By maintaining and enhancing landscape & townscape character, the area's uniqueness will be retained. The distinctive Staffordshire market towns of Newcastle-under-Lyme and Kidsgrove will benefit from reimagined town centres, taking full advantage of the recently awarded Town Deal funds, and better connectivity to the surrounding area. Environment and public realm improvements will be supported to improve the attractiveness of these centres as a destination.

**3.3** To enable more sustainable forms transport such as walking to local services & jobs, links between the countryside and the towns will also be strengthened increasing connectivity to and from new developments, the countryside & centres and ensuring that developments allow movement through them. Furthermore, improvements to public transport, cycling networks and travel information, which encourage a shift away from car use in the towns and increase transport choice in the rural areas will be viewed favourably. The Local Plan will, as appropriate, seek enhanced connectivity at all levels whether that be setting out measures at a neighbourhood level, establishing the requirement for inter urban transport links and/or for improvements to the strategic road network and rail connections.

**3.4** Through exploring the priorities for future public & private investment and collaboration, the Local Plan will help to secure provision of the infrastructure, services and facilities needed to sustain and enhance communities and support new development. Provision will be made to capitalise upon existing sectoral strengths in creating a stronger economy that will utilise regional opportunities for growth, research and investment including our established and emerging employment areas, Keele University, and promote our position as a major transport interchange in the heart of the country. This will help build a more diverse, dynamic and self-reliant economy; one which is not overly dependent on in or out commuting. Higher skilled jobs will be facilitated through improved tertiary- education provision and enterprise and innovation will be enabled through enhanced digital connectivity such as superfast broadband, which will also support rural businesses, enable more working from home and be more responsive to changes in the economy.

**3.5** Delivery of new housing is critical in ensuring that an appropriate quantity, quality (in terms of design & useability) and mix is provided, as well as a sufficient proportion of homes that are affordable and accessible to all. As such, the Local Plan will serve to support initiatives that build stable, safe, healthy and strong communities, which means respecting cultural diversity and distinctiveness; planning new development to help reduce crime, anti-social behaviour and the fear of crime; promoting well-being and health, e.g. through open space provision; ensuring that development is of local character through the use of Design Codes; and supporting area based renewal.

**3.6** The Local Plan will also endeavour to create more sustainable places that are resilient to future climate change, through measures such as well-designed & integrated networks of Green Infrastructure. Protecting and enhancing biodiversity will be critical to this. Where possible, carbon footprints will be minimised and sustainable transport choice will be improved. Low carbon growth will be sought through exploring inclusion of policies that seek the highest viable standards for energy efficiency, renewable energy and sustainable construction. Growth and development should also mitigate rather than exacerbate localised flooding problems caused by river flooding and/or surface water run-off. Similarly, air and other pollution impacts will be important determinants in establishing appropriate areas for growth.

**Figure 2 Keele University Campus**



### **Question 1**

**Do you agree with the Vision for the Borough? If not, how could the Vision be improved?**

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## 4 Strategic Objectives

**4.1** In addition to meeting the general requirements of the plan making process set in national policy, the Local Plan will meet the following local objectives (which should be seen as being inter-related and not sequenced in such a way as to reflect degree of priority) in order to deliver the vision for the future of Newcastle-under-Lyme Borough:

**SO-I** Create development with a sense of place and character, which naturally enhance human health through utilising sustainable construction methods and sustainable transport connections, where possible.

**SO-II** Diversify our employment base and deliver employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, high-tech/medi-tech and the green economy to generate more skilled jobs for local people.

**SO-III** Invest in the regeneration and re-imagination of the distinctive Staffordshire Market towns of Newcastle-under-Lyme and Kidsgrove to promote attractive public spaces, improvement and enhancement of the streetscape, independent stores, great restaurants, bars and cafes, a higher mix of residential and more alternative uses which draw in visitors and create a vibrant high street.

**SO-IV** Mitigate the impact of climate change in the Borough ensuring local policies promote sustainability and harness opportunities for renewable energy generation, carbon sequestration and greener construction, where this is viable and deliverable.

**SO-V** Provide a mix of housing types which are attractive to people that want to live and work in the Borough providing aspirational housing which is well designed and adaptable.

**SO-VI** Support the vitality of our rural villages, preserving and enhancing the special character which is valuable to each community whilst enabling balanced growth to improve affordability and provide choice in housing types for local people.

**SO-VII** Raise the profile of Kidsgrove railway station and improve the connectivity to Kidsgrove town centre as a significant sustainable transport hub in the Borough.

**SO-VIII** Provide a clear local strategic planning framework to support the development of Neighbourhood Plans which will set out the more detailed policies to guide development in the Borough.

**SO-IX** Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages as one of the Borough's greatest unique assets and to help enhance health and wellbeing.

**SO-X** Enable the growth of Keele University to support their vision for increasing student numbers and expanding their capacity for research and development, supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area.

**SO-XI** Deliver targeted development seeking a balance between growth and conservation to ensure that the Borough retains its identity as both an urban and rural Borough which provides the ideal setting for people wanting to enjoy countryside, village and town life in the West Midlands.

**SO-XII** Protect the Green Belt, except where exceptional circumstances justify strategic Green Belt release to meet identified needs.

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**4.2** The Council considers that the vision is aspirational but realistic. It highlights the overarching desire that the Borough should develop in a balanced, sustainable way which reflects the character of a mix of urban and rural communities with the market town of Newcastle-under-Lyme as the principal centre. Objectives flow from that vision, establishing locally specific objectives about the way in which the plan area will deal with the identified critical issues. It is considered these are clear, realistic, locally distinctive and spatial in planning terms, but we want to hear your views. It is important the vision and objectives reflect what the people that live and work in the area want the Local Plan to deliver.

**4.3** The Vision and strategic objectives have been formulated to align with the Council's 4 year Plan which seeks to address four priorities:

- **Local Services that Work for Local People**  
*This underpins everything we do. Our aim is to be a council that listens to its local residents and communities by being responsive to their needs, and to work with them to deliver first class services.*
- **Growing our People and Places**  
*We aim to build a strong and sustainable economy to ensure opportunities and support are available to everyone to improve their lives.*
- **Healthy, Active and Safe Borough**  
*We will ensure everyone enjoys a safe environment, and access to a wide range of facilities and activities to support residents and visitors to improve their health and quality of life.*
- **A Town Centre for All**  
*Creating two vibrant town centres in Newcastle and Kidsgrove where everyone can live, work, shop, study and spend their leisure time.*

**4.4** It is important to recognise that as the Borough Council is a member of the Stoke-on-Trent Staffordshire LEP (SSLEP - an alliance between local authorities and businesses), who play a central role in determining local economic policies, and undertaking activities to drive economic growth & local job creation, work from the SSLEP's Industrial Strategy (2020), which when considered alongside the outcomes, priorities and principles of the Staffordshire County Growth Plan (2018-2022), have provided a significant point of reference in influencing the Local Plan's own vision and objectives.

**4.5** The vision also seeks to reflect the Council's priority to mitigate the impact of climate change, which has become a corporate priority since the declaration of a Climate Emergency in 2019. The vision and objectives support the principle of sustainability as defined in the National Planning Policy Framework meeting social, economic and environmental objectives and also embrace the UN's Sustainable Development Goals (detailed below) which address social progress, economic well-being and environmental protection.



Figure 3 United Nations Sustainable Development Goals



## Question 2

Do you agree with the Strategic Objectives? If not, how could these be improved?



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## 5 Housing and Employment Need

**5.1** National planning policy requires local planning authorities to set strategic policies which should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

**5.2** *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for” (Paragraph 61, National Planning Policy Framework)*

**5.3** Newcastle-under-Lyme and Stoke-on-Trent are considered to function as one housing market area and as a functional economic area. As such, it is appropriate to consider the needs of the area as a whole when preparing the evidence base but apportion the amount of development separately so that each authority are able to address their own needs. The two authorities of Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council jointly commissioned Turley’s to produce a Housing and Economic Needs Assessment in 2020 which covers both authority areas. This forms the primary evidence for which the three options for growth have been derived.

**5.4** Dialogue with neighbouring authorities on this and other strategic matters will continue constructively, actively and on an ongoing basis throughout the Plan making process.

**Figure 4 New Housing Stock - Wilmott Drive, Newcastle**



### Housing Context

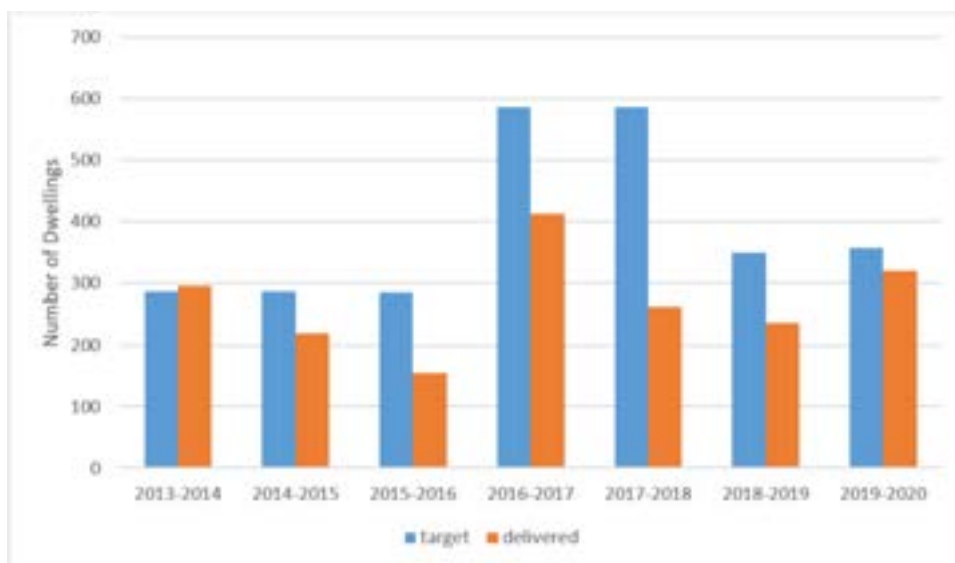
#### Past Housing delivery

**5.5** The housing targets have fluctuated over time due to the development of new evidence or changes at national policy level. From 2018 the standard method has been used to calculate housing need with the latest target presented for Newcastle-under-Lyme being 350 homes required per annum. The graph below

shows the trend of housing delivery in the Borough, which has consistently been lower than the target due to not having an up to date Local Plan in place to deliver new housing allocations. By producing a new Local Plan containing housing sites to meet the Objectively Assessed Need for housing this provides certainty to all on where and when new housing will be delivered, preventing speculative applications in less sustainable locations to meet the need.

**5.6** In the year with the highest delivery (2016-2017) 412 dwellings were achieved (see Figure 5 below), even without an up to date plan in place. This shows that higher delivery is possible under the right conditions and will be boosted by the identification of sites for housing in the Local Plan. Taking the average a total of 238 houses have been built each year since 2013.

**Figure 5 Past Housing Delivery**



**Figure 6 New housing stock - Birch House**

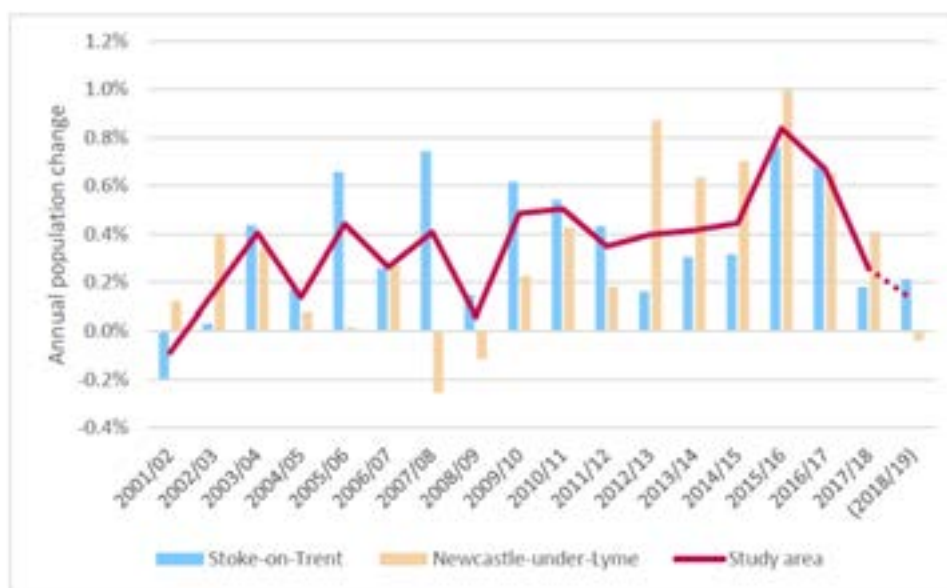


## Snapshot of trends in the local housing market

**5.7** The Housing Needs Assessment (2020) provides a full and detailed profile of the local housing market. Key trends can be summarised as follows:

**5.8** Population growth has been sustained, accelerating from 2012 – most notably in Newcastle-under-Lyme – but latterly slowing.

**Figure 7 Annual Population Growth (2001-2019) Source: Housing Needs Assessment, Turley's, ONS Data**

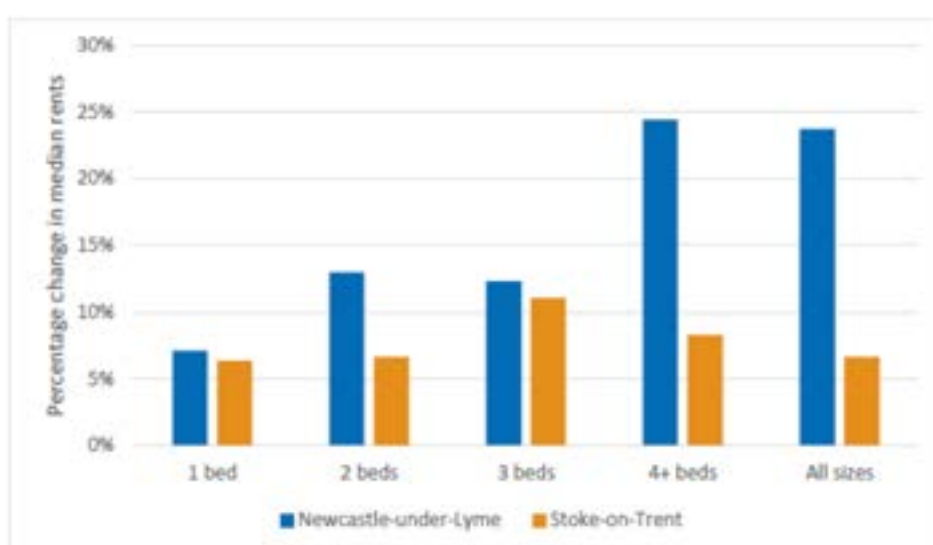


**5.9** House prices and rents have both risen in recent years, suggesting a degree of imbalance between supply and demand.

**Table 1 Change in average price paid, source: Housing Needs Assessment, Turley's**

	2013/14	2019	% Change
Newcastle-under-Lyme	£145,863	£166,362	14.1%
England	£264,350	£301,219	13.9%

**Figure 8 Percentage change in median rents**



**5.10** Size and type of housing required

- All modelling suggests growth in one person households, couples without children and households with children
- Existing trends suggest predominant need for homes with two or three bedrooms
- Larger homes are required in Newcastle-under-Lyme with the greatest demand for three bedroom properties
- Around three quarters of new homes might need to be houses as opposed to other types of dwellings to achieve this mix
- 28 net affordable homes are needed annually. Specific types of need are presented in Section 10.

## Economy Context

### Past Employment Growth

**5.11** The following table is taken from the Housing and Economic Needs Assessment produced by Turley's, and shows that employment growth in Newcastle-under-Lyme has been significantly lower than figures comparable to the wider local area, regionally and nationally. Employment in Newcastle-under-Lyme has essentially been stable, having recovered from a decline that followed the last recession with more jobs in each of the last five years than were recorded in 2009. As such, while the borough is implied to have created only 20 jobs per annum since 2009, this average rises to 177 jobs per year – or 0.2% growth per annum – when calculated over the period 2013-2018.

**Table 2 Recent Employment Growth 2009-18, source BRES**

	2009	2018	Change	Change per annum	Change per annum (%) rounded
Newcastle-under-Lyme	46,805	46,988	183	20	0.04%
Stoke-on-Trent	108,509	122,998	14,489	1,610	1.3%
SSLEP	434,410	487,144	52,734	5,859	0.9%
West Midlands	2,403,489	2,642,037	238,548	26,505	1.0%
England	24,068,097	26,841,506	2,773,409	308,157	1.1%

### Snapshot of trends in the economy

**5.12** The Economic Needs Assessment (2020) provides a full and detailed profile of the local economy. Key trends can be summarised as follows:

- Job growth has been sustained in recent years.
- The resident labour force has responded positively to this improving economic context with unemployment falling.
- New offices, warehouses and industrial premises have been delivered in recent years, but existing space has also been lost.
- Market activity has generally slowed in recent years, having peaked around the point at which the 2015 Employment Land Review was published.

### Size and type of employment required

**5.13** Whilst the assessment by Turley's shows that there is potentially a sufficient amount of employment land to sustain the proposed growth in the plan period, the issue is whether this is the right type of land in the right location and whether the quality of the existing land and premises are sufficient to meet demand.

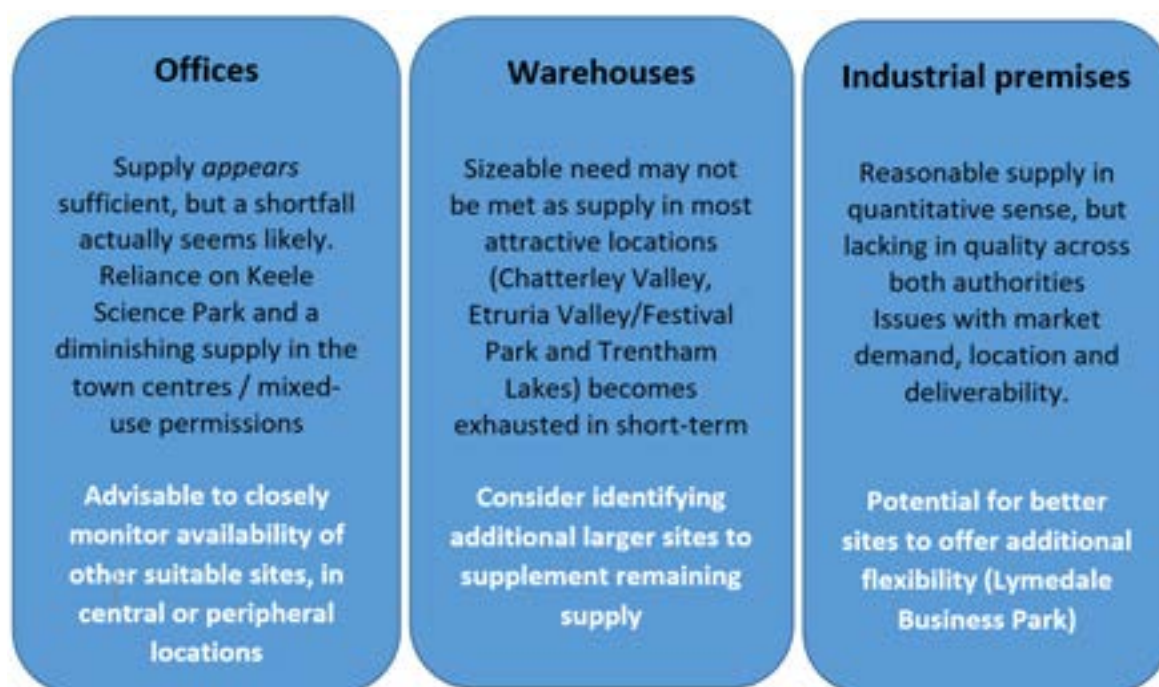


This is likely to already be an issue which has led to largely stagnated employment growth in the Borough over the past decade. Accordingly, the Local Plan needs to take a medium-long term view and seek to plan positively for balanced growth to meet the development needs of the Borough.

**Table 3 Current net supply of employment land**

	Newcastle-under-Lyme
Current Local Plan allocations	57.6ha
Vacant land within existing employment sites	6.8ha
Sites with extant planning permission for employment use	0.4ha
Existing supply of employment land	64.8ha

**5.14** New offices, warehouses and industrial premises have been delivered in recent years across the conurbations, but existing space has also been lost. Pressure for housing on underutilised, poorly located or constrained employment sites is limiting employment growth and having the effect of rationalising the existing stock to remain predominantly on the large scale employment areas such as Lymedale Business Park and Keele Science Park. The evidence suggests consideration of allocating different types of employment spaces:



### Question 3

Do you have specific comments to make with regard to this chapter?

## 6 Options for Growth

**6.1** As set out in the previous section, national planning policy anticipates that housing need will be calculated using a standard methodology, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The evidence produced for the Council shows that there is justification to consider alternative ways to calculate the need which are set out in this section.

**6.2** The evidenced drivers of need for housing and employment land are sustained demographic growth and anticipated employment growth although this currently largely relates to past trends of significant growth in the Stoke-on-Trent area, which still contribute overall to the growth of our joint functional economic area. Where jobs continue to be successfully created, this would be expected to lead to greater growth in population and housing need above the standard method.

**6.3** Whilst it is notable in all growth scenarios that there is currently a surplus of employment land, this does not account for any sites which the study has recommended re-allocating for other uses. Nor does it take into account the type, quality or size of the sites currently on offer and whether they are attractive to the market and well utilised. In addition, the evidence on need looked at the period 2020-2037, and this will require revision at the next stage to take it to the full plan period of 2040. Extending the plan period will likely have implications for the extent of surplus land. As such, new employment site allocations may still be considered for reasons such as ensuring sufficient flexibility & choice through the new Local Plan and to meet the needs of the full plan period.

**6.4** As growth in employment should in turn be matched to the level of house building to ensure the workers are attracted, the options detailed further in subsequent paragraphs can be summarised in numerical terms as:

**Table 4 Summary of growth options - housing**

Option		Dwellings per annum	Total dwellings requirement 2020-2040
1	Nationally set	350	7,000
2	Sustainable growth	410	8,200
3	Greater Job growth	445	8,900

**Table 5 Summary of growth options - employment**

Option		Need	Supply	Total requirement (surplus) 2020-2037
1	Nationally set	46.8	64.8	+18.0
2	Sustainable growth	52.6	64.8	+12.2
3	Greater Job growth	56.6	64.8	+8.2



## Option 1: Nationally set growth target (Standard Methodology)

**6.5** *Meeting our Objectively Assessed Need according to the Government's standard methodology for calculating housing need.*

**6.6** The standard methodology calculation (generated by the Government on an annual basis) would result in growth of 350 dwellings per annum, which equates to the delivery of 7,000 new homes over the plan period (2020-2040). It is also important to recognise that any future iterations of the standard methodology calculation will, as appropriate, be reflected in the Publication Draft Local Plan anticipated to be published for consultation in Autumn 2022.

**6.7** The need for employment land in this option is 46.8ha, the current supply identified in the Employment Need Assessment is 64.8ha and therefore there is a surplus of 18ha employment land (2020-2037).

### Option 1

**6.8** The standard method developed by the government is a 'one size fits all' formulae for local authorities to use to calculate how many new homes they need in their area. The method is heavily based on population projections. These projections show the number of households there would be in England if a set of assumptions based on previous demographic trends in population – births, deaths and migration – and household formation were to be realised in practice. National policy has continued to support the use of official population estimates up to and including 2014, although it is notable that subsequently released ONS population estimates show that the population has grown considerably higher, but this data cannot be used in the standard method calculation.

**6.9** When considering past delivery of housing and employment growth in Newcastle-under-Lyme authority area alone, the standard methodology represents the best fit target and most deliverable option. The target set in the Local Plan could last for 20 years and therefore it's important that we can confidently deliver the right number of homes year on year. Whilst all scenarios are likely to put pressure on the need for Green Belt release, this would be the lowest of all options. This is an important consideration as any attempt to increase the housing target must be robustly justified if this results in additional Green Belt release.

**6.10** However, when considering the role of Newcastle-under-Lyme as part of the wider conurbation with Stoke-on-Trent where there has been evidence of considerable growth and higher delivery than predicted, the standard method does not account for, or enable a continuation of growth on this trajectory. Whilst the Local Plan sets policies for the Newcastle-under-Lyme authority area alone, the nature and relationship of the joint housing and economic area with Stoke-on-Trent is a factor that requires consideration under the duty to cooperate.

**6.11** An additional important factor to consider is the economic growth aspirations for the Borough and whether the largely stable employment growth that has occurred over the past decade is acceptable, or whether in order to increase prosperity and job creation, more homes are required to support a higher population and more diverse local labour market. However, it is acknowledged that even in this minimum growth scenario, some job growth would be supported.

**Table 6 Option 1 Nationally set growth target summary**

Opportunities	Potential issues
This scenario most closely aligns with past delivery of housing and therefore it is likely to be the most easily deliverable option.	A continuation of past demographic trends in this area (Stoke and Newcastle-under-Lyme) would be unlikely to provide the labour force necessary to support a reasonable level of future job growth.

Opportunities	Potential issues
Will minimise the amount of new land required to meet development need, helping to protect Green Belt land <sup>(1)</sup> .	Unlikely to support even a baseline forecast of job growth produced by Experian (the Experian model is explained in Option 2).

## Option 2: Sustainable growth target (Experian baseline)

**6.12** *Plan for a housing target which aligns with projections for economic growth (Experian model projections)*

**6.13** The Sustainable growth target would result in a growth of 410 dwellings per annum which equates to the delivery of 8,200 new homes over the plan period (2020-2040).

**6.14** The need for employment land in this option is 52.6ha, the current supply identified in the Employment Need Assessment is 64.8ha and therefore there is a surplus of 12.2ha employment land (2020-2037).

### Option 2

**6.15** The Government's Planning Practice Guidance advises: where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

**6.16** In producing the Housing and Economic Needs Assessment, Turley's have examined forecasts for employment growth from three leading providers – Experian, Oxford Econometrics and Cambridge to inform the study. The forecasts predicted different outlooks for economic growth, however the forecast produced by Experian appears more applicable to the study area than others because:

- an earlier Experian forecast, presented in the last ELR, successfully predicted the job growth that has occurred in recent years with remarkable accuracy;
- the sectors in which Experian generally takes a more positive outlook - such as health, logistics, IT and professional services - have all seen strong job growth in recent years, and remain priorities both locally and across the Local Enterprise Partnership area; and
- it would less severely slow the recent rate of job growth, particularly in Stoke-on-Trent.

**6.17** Option 2 reflects the baseline forecast presented by Experian. It seeks to align the number of homes proposed with the forecasted growth in jobs over the plan period. The evidence suggests that 410 dwellings per annum will enable a sufficient supply of homes to accommodate the growing local labour force. This will help economic growth to be realised. Section 4 of the Housing Needs Assessment published alongside the Local Plan provides more detailed analysis on the prospect of higher housing need.

**Table 7 Option 2 Sustainable growth target (Experian Baseline)**

Opportunities	Potential issues
Boosts housing delivery and economic growth in line with the objectives of national planning policy.	Would result in a step change in housing delivery which may be challenging to meet.

<sup>1</sup> At this early stage it cannot be certain that under any future growth scenario that consideration of Green Belt release won't be required. However, this target would result in less pressure than other growth targets.

Opportunities	Potential issues
Justified by evidence in the Housing and Economic Needs Assessment which suggests for economic growth to be realised, this must be supported by the right level of new housing for the local workforce.	Would increase pressure for Green Belt release.
The Econometrics forecast has previously proved relatively accurate in previous forecasts for economic growth, and therefore is an optimistic, but realistic predictor of what could be achieved.	

### Option 3: Greater Job growth target (Experian plus)

**6.18** *Plan for a housing target which presents a more optimistic outlook for growth in industries that have previously performed very strongly and is justified by growth experienced over recent years in the wider functional economic area (predominantly in Stoke-on-Trent).*

**6.19** The Greater Job growth target would result in a growth of 445 dwellings per annum which equates to the delivery of 8,900 new homes over the plan period (2020-2040).

**6.20** The need for employment land in this option is 56.6ha, the current supply identified in the Employment Need Assessment is 64.8ha and therefore there is a small surplus of 8.2ha employment land (2020-2037).

#### Option 3

**6.21** It is notable that economic forecasts for the area are generally more conservative than past delivery has been. This is potentially reflective of the time of commissioning the forecasts (just after the coronavirus outbreak). The Employment Needs Assessment observes that the level of job growth forecast in Newcastle-under-Lyme and Stoke-on-Trent by Experian (used to develop option 2) would represent a near-halving of the recent rate. This is the basis of the justification for a more optimistic higher growth target, which would better align with a continuing programme of investment or an ambitious economic strategy, and is more reflective of past growth in the area. However, this is much more aligned to the high housing and economic growth delivery of the Stoke-on-Trent authority area.

**6.22** Similar to Option 2, the Greater Job growth scenario is based primarily on economic growth forecasting by Experian, although it also looks at the forecasting produced by Cambridge Analytics. However, unlike option 2, it positively adjusts the Experian forecasts in individual sectors where past local trends and/or the Cambridge Econometrics forecasts offer grounds for greater optimism in that sector. Taking for example, the transportation and storage sector which has seen pronounced job growth in previous years, it is therefore fair to assume this will continue to be a sector which grows going forward and generates higher job growth.

**6.23** The key limitation of this option is that it is more representative of the past economic growth trends in Stoke-on-Trent authority area, than that of Newcastle-under-Lyme Borough. For example, some sectors which have performed exceptionally in Stoke such as human health and social work, have actually declined in the Newcastle-under-Lyme authority area over the same time period. The evidence produced by Turley's does account for this to some extent in terms of the recommended housing targets which is why the housing scenarios presented vary only by a maximum of 95 dwellings a year between options 1 and 3 for Newcastle-under-Lyme, whilst the options for Stoke (which are not subject to consultation in this Local Plan) vary by 574 dwellings per annum.

**6.24** Creating the new Local Plan provides the opportunity to consider our role in contributing to the local economy and for any aspirations for economic growth. We must consider the duty to cooperate and how decisions made about the level of growth in our authority area have an impact on the wider area, particularly

in Stoke-on-Trent. Another factor for consideration is the known funding awarded for the Town Deals and high street which reflect the desire to invest in, and reimagine our town centres and should have a positive long term effect on the local economy over the plan period. The Greater Job growth scenario is ambitious, however it would be more attainable if coupled with a positive economic strategy which seeks to address issues in the Employment Needs Assessment which have caused employment growth to largely stabilise in the Borough. It is also significantly lower than previous targets that were recommended in the 2017 Strategic Housing Market Area Assessment.

**Table 8 Option 3 Greater job growth target (Experian Plus)**

Opportunities	Potential issues
Significantly boosts housing delivery and plans positively for economic growth in line with the objectives of national planning policy.	No recent precedent to demonstrate that this housing target could be delivered in the authority area.
Presents the greatest opportunity to develop a positive economic strategy which could lead to job creation in the borough.	Significantly increases pressure for Green Belt release.
Must be coupled with investment and infrastructure improvements to demonstrate that the uplift in housing is deliverable.	

#### **Question 4**

**Which option for growth is the most appropriate to use in the Local Plan?**

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## 7 Hierarchy of Centres

**7.1** A settlement hierarchy plays a significant role in helping to inform the ‘what could go where’ aspect of the Local Plan’s spatial strategy. By identifying and grouping settlements in the Borough according to what level of services and facilities they contain and their role in servicing the surrounding area the hierarchy establishes which locations are more sustainable and therefore more appropriate to accommodate greater levels of new growth.

**7.2** The existing settlement hierarchy is established in the Joint Core Strategy (2009)<sup>(2)</sup>. As services and facilities change over time, this information requires reviewing to inform the positioning of settlements in the hierarchy. In addition, the methodology requires review in order to ensure compliance with more recent policy and guidance. A joint Retail and Leisure Study was produced in 2019 with Stoke-on-Trent City Council which identifies a clear retail hierarchy of centres and has been used to inform the higher order tiers of the proposed settlement hierarchy.

**7.3** The Borough Council has also produced a supporting evidence document the Rural Topic Paper<sup>(3)</sup> which provides a more detailed and thorough consideration of the services and facilities in the rural part of the Borough. Both elements of the evidence have been used to produce the draft hierarchy. We welcome comments on both the proposed hierarchy and the supporting evidence. The hierarchy has been developed according to the current status of the centres. However, the hierarchy may change further as a result of the response to the possible growth directions under consultation to reflect the final proposed spatial strategy.

### Suggested Policy for the Hierarchy of Centres

In order to protect, promote and retain the long-term vitality and viability of the following hierarchy of centres, the provision for development of an appropriate scale and nature will be directed towards centres identified below:

#### Strategic Centre

- Newcastle-under-Lyme

*Newcastle-under-Lyme comprises the town centre and a number of wards which form the principal urban area of the Borough and contain the greatest range of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. This represents the most sustainable location for growth and is therefore the focus for new development.*

*Newcastle-under-Lyme Town Centre is the primary focus for uses which attract large numbers of people such as major cultural, tourist, social and community venues; and the primary focus for large scale retail, leisure and office development.*

#### Town Centre

- Kidsgrove

*Kidsgrove comprises a town centre and number of wards which form a secondary, but complementary role to the Strategic Centre, providing a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. It is a key location for growth.*

*Kidsgrove Town Centre is also an appropriate location for uses which attract large numbers of people such as cultural, tourist, social and community venues; as well as retail, leisure and office development.*

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2 <https://www.newcastle-staffs.gov.uk/planning-policy/current-development-plan>

3 <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base>

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*Kidsgrove contains a train station. Development which supports the viability of the rail service and helps to improve connectivity and the linkages between the town centre and rail station will be encouraged where it contributes to an attractive public realm.*

### **District Centres**

- Chesterton, London Road
- Silverdale, High Street
- Wolstanton, High Street

*The three District Centres are located within Newcastle-under-Lyme which is identified as the Strategic Centre and the focus for new development. District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. They are identified in the hierarchy because of their role and function, which should be protected to serve the local population reducing the need for people to travel to reach services and facilities. Their development target will form part of the overall target for Newcastle-under-Lyme.*

### **Rural Centres**

- Audley and Bignall End (joint)
- Baldwins Gate
- Betley and Wrinehill (joint)
- Loggerheads
- Madeley and Madeley Heath (joint)
- Keele and Keele University Hub (joint)

*Provide a significant role in service provision to the local population and contain a number of essential services and facilities in order to meet the day to day needs of residents. Rural Centres contain a primary school, convenience shop/post office, at least 3 community facilities, some form of health care provision and are accessible by bus to Newcastle-under-Lyme town centre during commuting hours.*

*The Rural Centres will meet some of the development needs of the Borough, commensurate to their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character.*

### **Neighbourhood Centres and Key Villages**

- Alsagers Bank and Halmer End (Joint Key Village)
- Bradwell, Hanbridge Avenue
- Butt Lane, Congleton Road
- Chesterton, Barbridge Road
- Clayton, Cambridge Drive
- Clayton Road (opposite Abbot's Way), Clayton
- Cross Heath, Liverpool Road
- Knutton, Knutton Lane
- May Bank, High Street
- Mow Cop (Key Village)
- Rookery, High Street
- Newcastle Town, George Street (eastern end)
- Parksite, Bath Road
- Porthill, Watlands View
- Seabridge, Tyne Way
- Westlands – Windermere Road



- 
- Talke – High Street
  - Thistleberry, Paris Avenue
  - Westbury Park – Westbury Road

*Provide a local role in service provision consisting of a parade of shops. These areas are unlikely to have specific growth targets but their retail function should be protected to serve the local population reducing the need for people to travel to reach essential services and facilities.*

### **Question 5**

**Do you agree with the proposed hierarchy of centres?**

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## 8 Spatial Strategy

**8.1** An integral element of a Spatial Strategy is in setting out a broad overview of where development could be located in the Borough over the period 2020-2040. Logically the spatial strategy would to a significant extent align with the hierarchy of centres, in that a greater proportion of development would be allocated in the larger centres than those areas lower down the hierarchy. However, this is made complicated by the presence of the Green Belt constricting growth around the urban area of the Borough and a limited land supply in the largest settlements. As such, this chapter will look at a range of concepts for distributing new development and their relative merits and disadvantages.

**8.2** This chapter deliberately presents broad concepts and directions for growth with the aim of gaining an initial indication of where you think the Borough could grow. It does not present sites or a specific amount of development for each location. The feedback to the consultation will assist the Borough Council to focus research, stakeholder engagement and community consultation on those directions for growth which are the most viable, deliverable and supported locations to develop a more specific set of policies and site allocations for consultation in the Publication Draft due in Autumn 2022.

### Why are we asking about the spatial strategy before the option for growth has been selected?

**8.3** The three options for growth in chapter 6 present a relatively narrow range of total dwellings required, from 7,000 in option 1 to 8,900 dwellings in option 3 over a 20 year period; a difference of 1,900 dwellings. Whilst this is not an insignificant amount, it is clear that any growth scenario is likely to result in a similar pattern for the spatial strategy for at least 7,000 dwellings, but the difference would be how many dwellings are sought at each location depending on the growth scenario, and whether an extra site or sites are required to meet the highest growth target, if this were selected.

**8.4** It is also important to emphasise that whilst it is acknowledged that there are some obvious attractions associated with smaller levels of development such as less traffic, less pressure on countryside (including Green Belt), heritage and infrastructure & so on, a Local Plan that does not plan for the Borough's needs would not be found sound at examination and, it is argued, would also not represent the best interests of the community as a whole. Furthermore, in recognising the demands for new development, a fundamental purpose of the Local Plan is to plan for this in a sustainable way that maximises the benefits associated with such growth and minimises any harm. As such, options that were lower than the government's minimum growth target are not considered reasonable for consideration.

**8.5** The Borough Council is keen to engage with the community as much as possible and at the earliest stage, to present the challenges with growth, identify the key issues, and to listen to how you think the Borough should grow. This will help refine the proposals at the next stage where specific sites for development will be identified to reflect the preferred growth option.

**8.6** The Local Plan has also had a head start, as much of the evidence produced to support the withdrawn Joint Local Plan is up to date and has a high degree of relevance to this Local Plan such as studies on housing, the economy and the Green Belt. Spatial Strategy Directions for Growth in this chapter are based on previous intelligence gathered during the production of the Joint Local Plan. However, we have an open Call for Sites, which mean some sites or options could be identified at the next stage which are currently not known to the Council. The process of site selection will be started from scratch as explained in the next section on the Green Belt.

### What are we doing to protect the Green Belt?

**8.7** National Policy is clear that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

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**8.8** The Borough Council wants to protect the Green Belt, and in line with national guidance will examine fully all other reasonable options for meeting its identified need for development. The Council will produce a Local Plan strategy which:

- makes as much use as possible of suitable brownfield sites and underutilised land;
- optimises the density of development including promoting a significant uplift in minimum density standards in town centres and other locations well served by public transport; and
- will be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through statements of common ground.

## **Why are we presenting options in the Green Belt at this stage?**

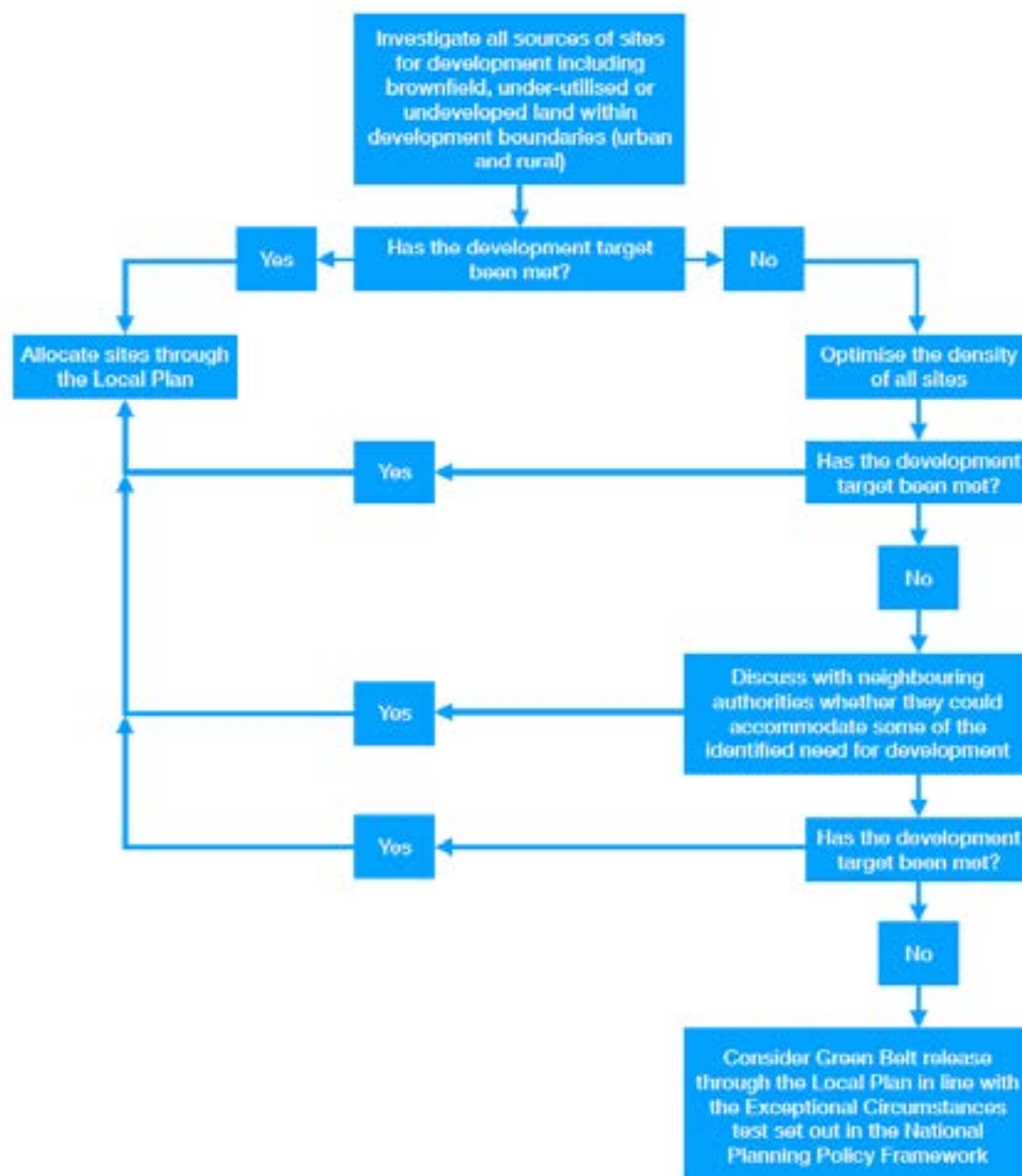
**8.9** The Borough Council will exhaust the options for development on non-Green Belt land as detailed above before considering Green Belt sites. In the event that any release of land in the Green Belt is required through the Local Plan, a Topic Paper will be produced to show the process undertaken. This will be published alongside the Publication Draft of the Local Plan anticipated in Autumn 2022.

**8.10** It is known that there is very limited land supply within the development boundary of the urban area and that the edge of Newcastle and Kidsgrove are bounded by the Green Belt on all sides. There is virtually no undeveloped open land within the urban area that is not already built on, has planning permission for development, or is safeguarded for other uses. There is also relatively limited brownfield land remaining, although this will be reinvestigated thoroughly through this Local Plan and through a further call for new sites.

**8.11** As stated above, the work on the withdrawn Joint Local Plan reached an advanced stage and so the concepts are based on the intelligence that was gathered before the plan process was restarted. By the end of 2020, it was considered that approximately 2,500 dwellings could be found on land within development boundaries. This is far short of the nationally set target (growth option 1).

**8.12** It is acknowledged that the concepts may be considered as being premature, in that the process of exhausting land supply needs to be restarted and that conversations with neighbouring authorities are required to establish whether some of the need can be met elsewhere. However, in order to maximise the value of this consultation, and to allow the Local Plan production to continue at pace with the three stages of consultation, it is worthwhile to ask significant questions about growth from the start. In addition, exceptional circumstances to remove land from the Green Belt may exist for reasons other than simply meeting housing need.

**Figure 9 Diagram illustrating next steps following the Issues and Strategic Options Consultation**



## Maximising growth in the urban area of Newcastle-under-Lyme and Kidsgrove and within development boundaries of Rural Service Centres

**8.13** Land within towns and villages identified in the hierarchy of centres are in principle the most appropriate locations for growth. These areas generally have good infrastructure provision, offer the best opportunities for sustainable transport and are already established communities.

**8.14** In accordance with the proposed hierarchy of centres the greatest level of growth should be directed to the higher order centres. These include the Strategic Centre of Newcastle-under-Lyme Town Centre, Kidsgrove Town Centre and the District Centres of Chesterton, Silverdale and Wolstanton. It is also reasonable to allow for development within existing settlement boundaries of defined Rural Centres and within settlement boundaries in areas which are accessible to the Neighbourhood Centres and Key Villages.

**8.15** To identify land within this area the Council will:

- Assess all responses provided in Summer 2021 to the request to landowners, developers and agents to confirm submitted sites;
- Advertise the 'Call for Sites' alongside this consultation to receive submissions of new plots of land;
- Use mapping tools to identify any potential plots in the urban area or within villages which seem underutilised and use land registry searches to identify ownership to determine whether these sites could be added to the supply;
- Assess the Council's Brownfield Land Register to include all sources of supply and to overcome and barriers to delivery;
- Review land in public ownership to consider whether any land could be repurposed for housing.

**8.16** As sites within development boundaries already benefit from the assumption that the location is suitable in principle to being developed, this does mean that there is a very limited supply of sites remaining, and virtually no undeveloped land which could be allocated for housing. In the past few decades the redevelopment of brownfield including former industrial sites has largely been taken up, leading to some Green Belt development for employment uses in the previous Local Plan including Chatterley Valley as part of the Ceramic Valley Enterprise Zone and for Keele Science and Innovation Park.

**8.17** Intelligence on the now withdrawn Joint Local Plan suggests that all known suitable, available and deliverable sites within development boundaries only equated to a maximum of 2,500 houses and therefore growth in the Green Belt and rural area is highly likely to have to be explored as part of the spatial strategy for the Local Plan.

**8.18** All concepts on the following pages are shown on the understanding that they would be considered only after suitable development within the limits of the urban area and villages had been maximised, and only once all of the necessary steps to avoid Green Belt development have been undertaken, including discussing with neighbouring authorities about the potential to meet our needs.

### Question 6

**Do you have suggestions for new development sites within development boundaries? (Please see the evidence base & topic papers webpages within the Planning Policy - Local Plan section of the Borough Council's website for maps of all existing development boundaries).**

### Question 7

**Are there any areas in Newcastle-under-Lyme, Kidsgrove and within the development boundaries of Rural Service Centres that should be protected from development?**

## Strategic Urban and Rural Extensions

**8.19** In the event that insufficient land for housing can be found inside development boundaries and following the steps outlined at the start of this chapter and in Figure 9 above, it may be necessary to explore the potential of land adjacent to existing settlements to be developed as an urban or rural extension. These are presented as Growth Directions as opposed to set options at this stage, to reflect the fact that it is not known to what extent development will be required until the next stage. It is helpful to obtain perspectives of the public, businesses and infrastructure providers on the issues and opportunities associated with these broad Growth Directions to understand whether they are reasonable, and whether any alternatives have been missed. For any of these Growth Directions to be taken forward, further evidence gathering is required to show much more detailed proposals and specific site boundaries at the next stage.

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**8.20** For the purpose of this Local Plan an urban or rural extension is considered to provide at least 1,000 dwellings. This is a minimum, and some of the Growth Directions could accommodate more dwellings. Large scale sites offer the scale of development which necessitates a greater degree of infrastructure provision. Whilst having a potentially greater impact on the landscape, this is concentrated in one area which would be subject to a comprehensive masterplan and potentially design codes. In theory, developer profit and therefore contributions are higher which enables benefits to be sought from the development to offset its impact, which can sometimes be of a scale which is also beneficial to the existing community. Depending on the scale of the extension the site may need to provide a new school, health centre and/or local convenience retail. Development would be expected to explore optimum walking, cycling and public transport connections, and in doing so this may also result in benefits to the existing community, such as an extension to footpath or a cycle lane, for example. Extensions should be designed to maximise integration with the existing community.

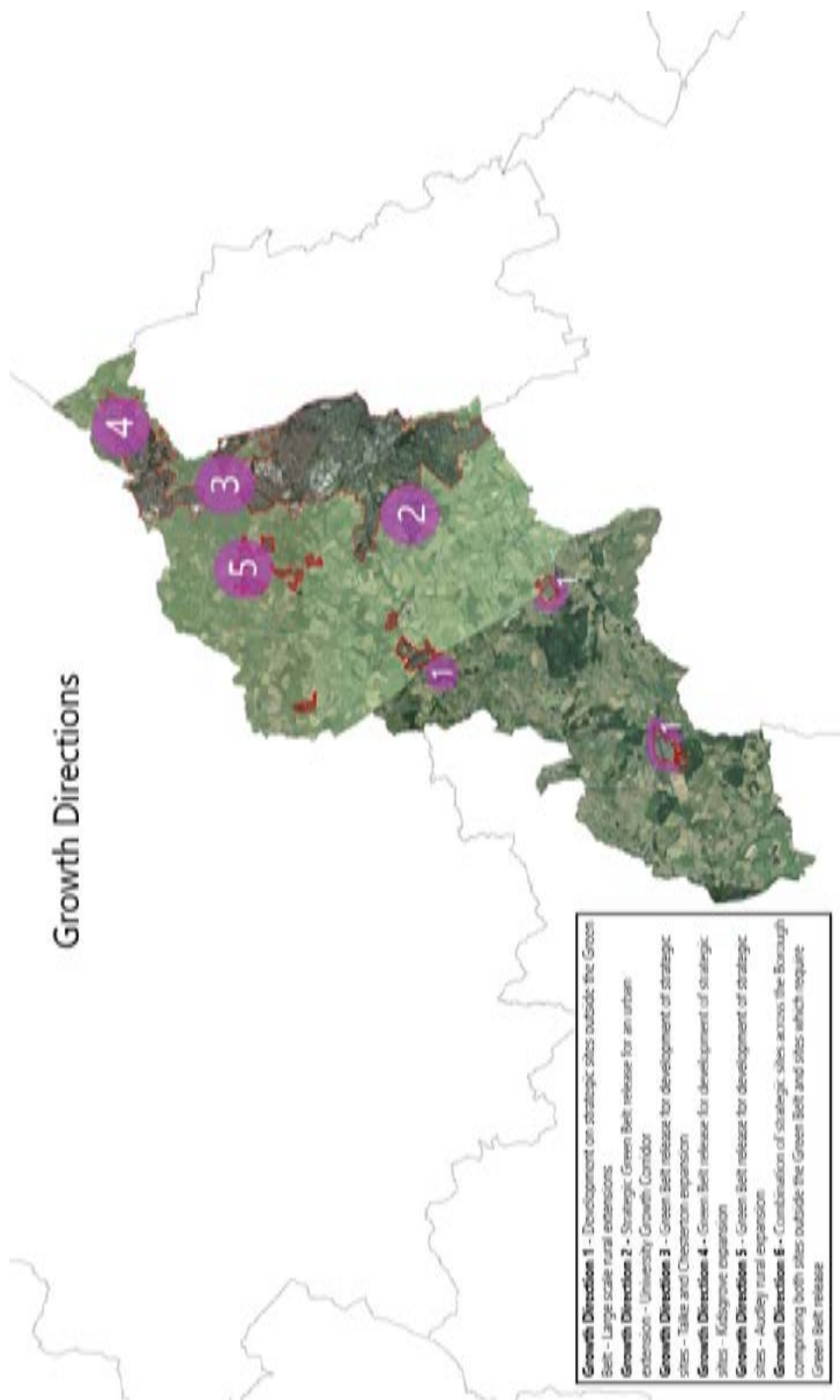
**8.21** There has been no large landholdings in the rural area which have been submitted in the past or identified to be considered for a possible new settlement, and therefore the Growth Direction for rural extensions focuses on the edge of existing settlements.

**8.22** This section presents the following potential Strategic and Rural Extensions:

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



Figure 10 Growth direction options



## **Growth Direction 1: Development on strategic sites outside the Green Belt – Large scale rural extensions**

**8.23** The Green Belt boundary is drawn tightly around the urban area of Newcastle and Kidsgrove marking a swathe of rural land around the urban area and many villages. The Green Belt encompasses a significant proportion of the Borough's land area overall. This proposed Growth Direction seeks to concentrate development on land beyond the Green Belt, commonly referred to as 'leapfrogging' the Green Belt. This would focus development at the south western rural edge of the Borough on areas not protected by the Green Belt designation and therefore would not result in any Green Belt release. There are only a few villages in the rural settlement hierarchy that are not wholly within the green belt which have sufficient services and facilities to either support growth, or be supplemented by new facilities to create an expanded settlement. These are Loggerheads and Ashley, part of the settlement of Baldwin's Gate that is not within the Green Belt, and the area immediately south of Madeley which is also not in the Green Belt. Despite not being within the Green Belt, development near to, or adjacent to the Green Belt can still have an impact on the openness of areas in the Green Belt. Sites in these areas were previously submitted to the Council but none were of a scale that would be considered as an urban extension (circa 1000 dwellings).

**8.24** This is the only Growth Direction, aside from neighbouring authorities meeting our need, which could potentially safeguard the green belt from development.

**8.25** The Council does not consider this Growth Direction to be reasonable as it is not in accordance with Neighbourhood Plans, it is unlikely to be deliverable, and large scale development in peripheral locations in the Borough would encourage unsustainable patterns of commuting along rural roads. However, we recognise development in these areas could be attractive to the housing market and it has been given initial consideration as an alternative to development in the Green Belt.

**8.26** Smaller scale development in the rural area may be appropriate and is considered later in this chapter.

**Table 9 Opportunities and potential issues for Growth Direction 1**

<b>Opportunities</b>	<b>Potential issues</b>
Safeguard the Green Belt	Landholdings are in multiple ownerships and no land of a scale suitable for one significant extension has been submitted to the Council, meaning it is likely this option is not deliverable.
Prevents urban sprawl	Not in accordance with the made Loggerheads Neighbourhood Development Plan (NDP) and the made Chapel and Hill Chorlton, Maer and Aston and Whitmore NDP.
Providing choice and diversity in the housing market which would need to be supported by infrastructure including a new high school at Loggerheads	Does not support the proposed strategic objectives SO-VI which relate to preserving the character of rural villages.
	Even with significant transport infrastructure investment the likelihood is that it would lead to more private vehicles commuting on rural roads to access employment and major services in Newcastle-under-Lyme leading to congestion and air pollution.
	The proximity of villages to Shropshire may generate more travelling and out commuting to Market Drayton which could result in issues with the duty to cooperate, and would not support the Local Plan

Opportunities	Potential issues
	strategy of economic growth within the authority as the potential locations of the housing are likely to encourage people travelling to work outside the Borough.
	Development on land near to, or adjacent to the Green Belt can have an adverse impact on the openness of areas in the Green Belt.

## Growth Direction 2: Strategic Green Belt release for an urban extension - University Growth Corridor

**8.27** This Growth Direction seeks to align with the growth aspirations of Keele University which seek to expand their Science and Innovation Park to provide more business and research facilities as well as postgraduate accommodation on campus. Most land considered for the University Growth Corridor is under the control of the two principal land promoters, Keele University and Newcastle-under-Lyme Borough Council. North of the A525, most of the proposed development land is within the ownership of Newcastle-under-Lyme Borough Council. This consists of the former Municipal Golf Course (now vacant), Keele Driving Range, and the Park Road allotments (approximately half vacant). Other land interests include open fields owned by Keele University and three small parcels of farmland in private ownership. South of the A525 the proposed development site is completely within the ownership of Keele University and is currently open fields. There is further land available in private ownerships which has been previously submitted for consideration, making this an area with high potential for large scale development.

**8.28** The University have received funding for their Smart Energy Network Demonstrator initiative (known as SEND), providing a unique testing site for the evaluation of new and evolving renewable and low carbon energy technologies. Development adjacent to the University could potentially expand on this infrastructure or alternatively could also be exemplar 'greener' developments. Co-locating housing and employment in close proximity maximises the potential choice in the market for students, post graduates and employees to live close to where they work and study.

**Table 10 Opportunities and potential issues for Growth Direction 2**

Opportunities	Potential issues
Providing choice and diversity in the housing market within close proximity to the a regional scale employment base: Keele University	Permanent loss of Green Belt land.
Supports proposed Strategic Objectives SO-II and SO-X relating to economic and University growth and aligns with the proposed vision	Potential heritage implications - Keele Village and Keele University contains Listed Buildings and a Registered Park and Garden.
Opportunity to investigate utilising some of the University led renewable energy and sustainable transport projects in adjacent development sites	Potential biodiversity implications – undeveloped land could provide habitats for local wildlife which may be lost.
Closest of all potential extensions to the centre of Newcastle with opportunities to utilise and enhance current public transport provision	Even with significant transport infrastructure investment the likelihood is that it would lead to more private vehicles concentrated on Keele Road to access employment and major services in Newcastle-under-Lyme potentially leading to congestion and air pollution.

Opportunities	Potential issues
Likely to be a deliverable option with high market demand for housing in the area and some investigation and consultation on potential key sites has taken place	

### **Growth Direction 3: Green Belt release for development of strategic sites - Talke and Chesterton expansion**

**8.29** The area between Talke and Chesterton predominantly comprises agricultural land with farmsteads and some areas of business uses either side of the A500 which cuts across the area. The area has a mining legacy and does contain contaminated areas which increase the cost to remediate the land for development and can extend the time taken to deliver sites. The topography is undulating with some parts of Chesterton at an elevated level with long reaching views. The area is well located for employment, public transport routes and some smaller local centres, but is further from town centres than some of the alternative Growth Direction's proposed.

**8.30** Chesterton is identified as a District Centre in the settlement hierarchy and Talke only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt.

**Table 11 Opportunities and potential issues for Growth Direction 3**

Opportunities	Potential issues
This area contains one of the largest weak Green Belt sites in isolation (in terms of contribution to the Green Belt) and therefore some development may be of lesser impact than alternatives	Permanent loss of Green Belt land. Additionally this is a sensitive location to develop wholly (circa 2000 dwellings) without contributing to urban sprawl and therefore causing an adverse effect on the openness of the Green Belt.
Good opportunities to enhance local infrastructure such as public transport connections, school extensions or new primary schools and close to existing centres	Potential heritage implications – Wedgewood Monument, Grade II Listed is prominent in the landscape and is at risk. There is a potential project to repair and reinstate the monument. Talke also has a Conservation Area.
Providing choice and diversity in the housing market within close proximity to strategic scale employment sites including the retail park at Talke, High Carr and Lyndedale Business Parks, and Chatterley Valley	The A34 Talke Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate mitigation.
	Multiple land ownerships in Chesterton could lead to delivery issues.
	Sites likely to be highly contaminated due to former industrial uses which could affect viability.

## Growth Direction 4 – Green Belt release for development of strategic sites - Kidsgrove expansion

**8.31** Kidsgrove is identified as second only to Newcastle-under-Lyme in the settlement hierarchy and therefore extensions on the edge of the settlement would provide new residents with access to a good range of services and facilities and to the train station, in an established town centre.

**8.32** Whilst there isn't one large strategic scale site identified in Kidsgrove, a number have been previously submitted in close proximity to each other, particularly to the north east of Kidsgrove. Kidsgrove is a well-established town with a strong sense of community and has a good range of services and facilities. It benefits from the only train station in the Borough which offers a sustainable means of travel for residents. Connectivity around the centre is likely to be improved by the recently received Town Deal. Kidsgrove borders both Stoke-on-Trent and the Cheshire East boundary and therefore the Green Belt serves a strong purpose around the town.

**Table 12 Opportunities and potential issues for Growth Direction 4**

Opportunities	Potential issues
Providing choice and diversity in the housing market in a town which has recently benefitted from town deal and high street funding	Permanent loss of Green Belt land.
Kidsgrove contains the only train station in the Borough and therefore has the greatest potential for new residents to access public transport, and to improve viability of the train services	Close to the border with Stoke and Cheshire East meaning Green Belt development could result in urban sprawl, cumulative harm to the openness of the Green Belt and issues with the duty to cooperate (depending on location).
Close to employment at West Avenue and reasonably close to Chatterley Valley and Talke retail park and surrounding industrial units	Most larger sites are identified to the North East of Kidsgrove where the topography and proximity to Mow Cop and Harsiahead may not be appropriate for large scale development.
The town benefits from a range of services and facilities which would serve new residents	Range of landowners which may affect timescales for delivery.
Existing capacity in Kidsgrove High School to accommodate additional pupils	

## Growth Direction 5 – Green Belt release for development of strategic sites - Audley Rural expansion

**8.33** Audley parish is entirely within the Green Belt. It contains six villages, each with a distinct community identity. The greatest number of services are contained in Audley, although it does not contain any of the primary schools and the high school is located at Halmer End. Audley and Bignall End are defined as a Rural Centre in the settlement hierarchy and therefore there is a lesser range of service provision than the District Centres or areas which are more accessible to Newcastle-under-Lyme or Kidsgrove town centres.

**8.34** The parish contains some large farm holdings in single ownership therefore providing potential for a large scale rural expansion site. It is however a rural area, set physically apart from the urban areas of Newcastle and Kidsgrove with some areas of steep topography, unique character and heritage surrounded by productive agricultural land. It does not contain a vast employment base and development would likely promote commuting on rural roads to places of work in the urban area.

**Table 13 Opportunities and potential issues for Growth Direction 5**

Opportunities	Potential issues
Providing choice and diversity in the housing market in an area which has seen very low growth in recent years.	Permanent loss of Green Belt land. Could lead to sprawl between villages (subject to the location of development) which would have an adverse impact on the Green Belt.
Potential to consider in conjunction with large scale strategic employment opportunity in Audley Parish at Junction 16	Potential heritage implications – potential impact on Audley Conservation Area and Listed Buildings as well as Wedgewood Monument.
Existing capacity in Sir Thomas Boughey Academy to accommodate additional pupils but a new primary school would be required to serve large scale development	Not within close proximity to strategic employment sites or any town centre.
	Even with significant transport infrastructure investment the likelihood is that it would lead to more private vehicles concentrated on narrow rural roads to access employment and major services in Newcastle-under-Lyme potentially leading to congestion and air pollution.
	Does not support the proposed strategic objectives (SO-VI) which relate to preserving the character of rural villages.

## **Growth Direction 6: Combination of strategic sites across the Borough comprising both sites outside the Green Belt and sites which require Green Belt release**

**8.35** This Growth Direction would avoid focusing the majority of growth in one or two locations but look at each development site on its individual merits and actively aim to spread development across the Borough on large scale sites. The locations can therefore not be evaluated at this stage and it is unclear how this would accord with the settlement hierarchy.

**8.36** Whilst this would spread the impact of development, it is unclear whether this would be a deliverable option as the ability to identify and fund a number of infrastructure projects to serve a number of sites of a large scale at different locations may be problematic. If sites were reduced in scale from approximately 1000 each to 500 dwellings, for example then they may be quicker to deliver but this has to be balanced with the issue that they are then under the threshold to deliver new schools and other facilities, adding to the impact on existing services and facilities in any one location.

**8.37** The Green Belt Assessment Part 2 was commissioned to undertake site assessments for a selection of all sites identified as weak performing Green Belt sites and some moderate performing Green Belt sites. This option would provide the greatest opportunity to focus development on sites which had the weakest contribution to the 5 purposes of the Green Belt.



**Table 14 Opportunities and potential issues for Growth Direction 6**

Opportunities	Potential issues
Providing choice and diversity in the housing market across the borough.	Permanent loss of Green Belt land. Would impact a number of locations and therefore the cumulative impact of such developments on the Green Belt would require consideration.
Utilises all Green Belt which have the weakest contribution to the Green Belt first although it is acknowledged there is insufficient sites to meet the need	Potential heritage and biodiversity implications – dependent upon the location of sites.
Spreads the impact of development across the borough	Spreading the development may limit the potential for strategic infrastructure improvements which may also affect the delivery of sites. For example; development may impact on a number of schools but with potentially insufficient new development at each location to provide contributions for new schools. This would be a key constraint if existing school sites cannot be expanded.
	Most weak and moderate sites are located within the areas already identified for potential extensions, all of which have some constraints relating to transport congestion and pollution.

### **Question 8**

**Which option/s for expansion do you support?**

### **Question 9**

**Which option/s for expansion do you disagree with?**

### **Question 10**

**Are there any alternative options which require consideration?**

## **Development in the Rural Area**

**8.38** The previous section has presented some radical ideas for focusing large scale development on parts of the rural area, specifically strategic growth directions 1 and 5. Even from an initial 'concept' stage it is evident that there are potentially significant issues with very large scale development in areas which do not presently have sufficient infrastructure, services and facilities to accommodate new growth, coupled with the potential impact on rural character and the existing communities. As such, this section presents an alternative choice to strategic growth directions 1 and 5, taking a smaller share of the overall housing

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target, proportionate to the level and role of villages in the hierarchy of centres. This option is only applicable in the instance that Growth Directions 1 and 5 are not further pursued at the next stage and therefore it would be on the basis that no strategic scale extensions to rural villages were allocated through the plan.

**8.39** As with all Growth Directions presented in this chapter, a precise figure is not set out for the rural area in this consultation document, but it is recognised that some development may be required to meet the development needs of the area and to provide choice in the housing market.

**8.40** National Planning Policy supports rural housing as a means of sustaining vital services and addressing the problem of housing affordability.

*'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'* (Paragraph 79, National Planning Policy Framework)

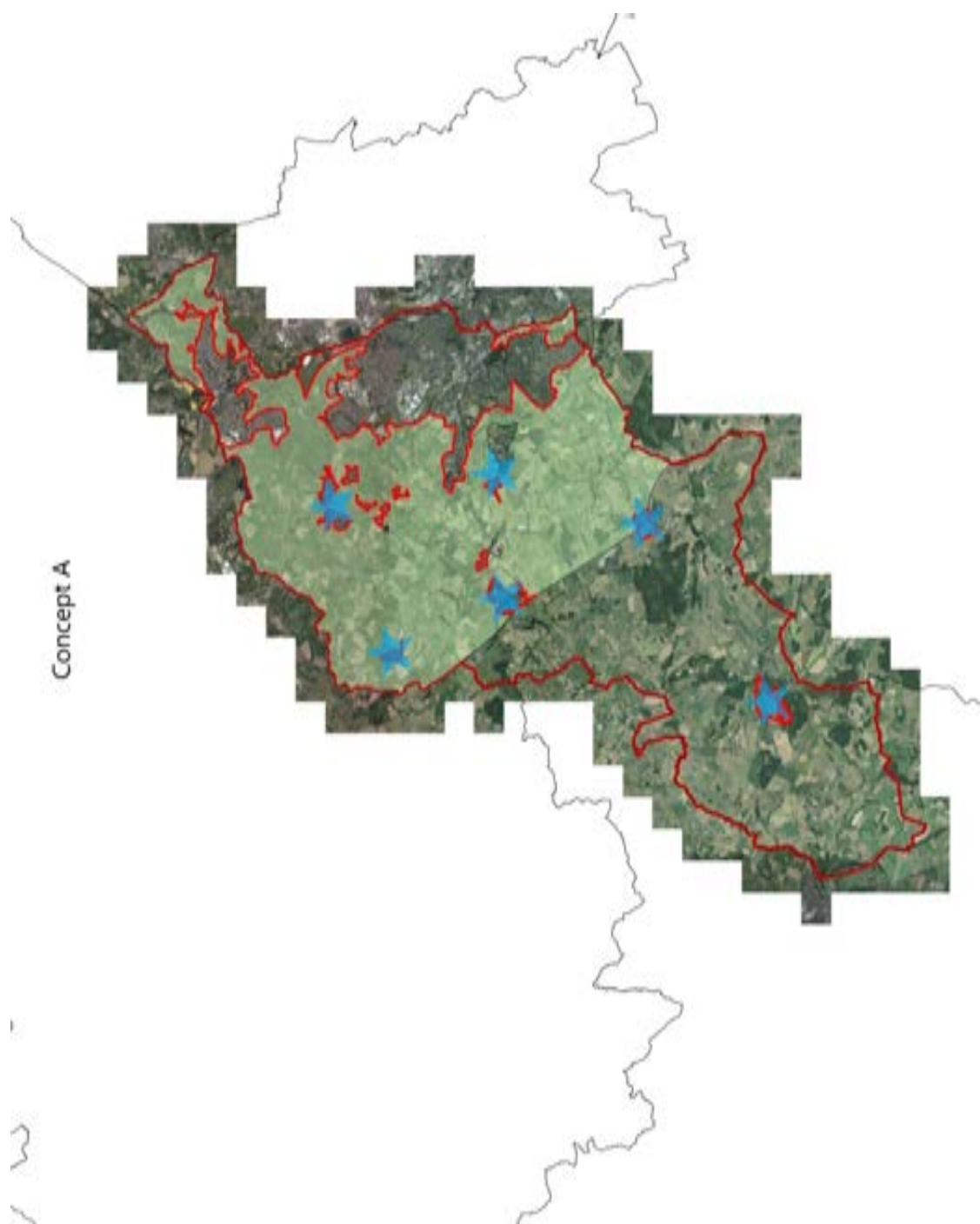
**8.41** There are no allocations for development on land outside the settlement boundaries of rural villages in the existing development plan. Despite this it is evident that there has been demand for new housing in the rural area and speculative applications have focused on villages which are not afforded protection by the Green Belt. This has resulted in a number of permissions for major development, particularly in the villages of Baldwin's Gate and Loggerheads. These villages both have Neighbourhood Development Plans and neither plan has sought to deliver any new allocations for development.

**8.42** Further analysis is needed on past delivery in the rural area to understand the context for any new development in each settlement. Further information is also provided in the Rural Topic Paper which sets out a broad overview of the number and range of service provision for each settlement, its potential for sustainable transport connections and an indication of potential infrastructure capacity. The Council is also commissioning a Landscape Character Assessment and this will complement other evidence on significant habitats and heritage. This document is anticipated to be published in Spring 2022. These are all factors which will need to be further considered in distributing growth and therefore this may provide evidence for individual targets for each of the Rural Centres, as opposed to splitting development equally across all centres.

### **Question 11**

**Should development in the rural area be spread equally across the Rural Centres? If not, how should growth be distributed in the rural area?**

Figure 11 Map showing the rural centres in Newcastle-under-Lyme



## 9 Gypsy and Travellers

**9.1** Gypsy and Travellers form part of our community and their need for accommodation should be addressed through the Local Plan. The 2021 National Planning Policy Framework (NPPF) states in Paragraph 62 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy (including travellers)'. Planning Policy for Traveller Sites (PPTS) 2015 requires local planning authorities to demonstrate an up-to-date, five-year supply of deliverable Gypsy and Traveller sites.

**9.2** In 2020, the Gypsy and Traveller and Travelling Showperson Accommodation Assessment was produced which forms the evidence setting out the future pitch requirements for accommodating permanently settled gypsies, travellers and travelling showpeople as well as those in transit.

**9.3** The Assessment provides comprehensive information on gypsy and traveller households and has been formed through engagement with the gypsy and traveller community. The existing provision of accommodation at the time of undertaking the study was as follows:

- Silverdale (authorised) – 19 permanent pitches
- Baldwin's Gate (unauthorised) – 4 permanent pitches
- Kidsgrove (authorised) – 4 travelling showperson's plots
- Transit provision – none

### Future Requirements

**Table 9 Future Pitch & Plot Requirements**

	In the five years (2020/21) – 2024/25	In the longer term <sup>(4)</sup> (total need) (2020/21 – 2036/37)
Permanent Gypsy and Traveller sites requirement	5 pitches	7 pitches
Travelling Showperson plot requirements	2 plots	4 plots

**9.4** The existing authorised permanent site in the Borough at Silverdale may be able to be expanded nominally but this would not accommodate the Boroughs identified need. As such, it is clear that a further site will need to be identified through the Local Plan.

**9.5** There is currently one Travelling Showperson yard in the Borough accommodating 3 households on 3 plots. There is a need for 4 additional plots over the period to 2036/37 (2 within the first 5 years). The current owner would be interested in speaking further with the Council over the development of an additional yard in the Borough.

**9.6** Based on precedent from elsewhere, such as Derbyshire, an indicative pitch size of the 325 sq.m is considered reasonable as this would provide space for an amenity block (kitchen, bathroom, living room) and touring caravan space for up to 2 caravans and 2 vehicles. Allowing for flexibility for reasons of family unit size and to ensure that sufficient provision is available to the end of the Plan period (2040), a site or site(s) of approximately 0.5ha will be required.

4 The Plan period is to 2040 and therefore the Plan may allocate additional pitches and plots to meet the long term need

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## Temporary stopping places and transit provision

**9.7** There are a number of ways to deliver temporary places where Travellers can stop whilst passing through a local authority area. These include transit pitches, stop over places and negotiated stopping arrangements. <sup>(5)</sup>

**9.8** Transit sites are permanent sites intended for temporary use by Gypsies and Travellers. The length of stay is usually limited to a maximum of three months. In terms of transit pitches, 'Designing Gypsy and Traveller Sites: Good Practice Guide' (CLG, 2008) states:

- Size of pitch – sufficient to accommodate two touring caravans, two parking spaces and private amenities;
- Amenities should include electricity supply, toilet, wash basin and shower with hot and cold water supply for each pitch;
- Depending on the level of use, portable facilities may be more appropriate, particularly if the sites are empty for lengthy periods of time and therefore at risk of vandalism.

**9.9** A temporary stop over area is land which can be used on a temporary basis if unauthorised encampments occur or likely to occur. They can be fields, areas of hardstanding or a mixture of both. Temporary facilities can be provided when the temporary stop over is in use, for instance portable toilets and rubbish collection.

**9.10** Negotiated stopping involves Councils making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary but usually include the provision of portaloos, waste disposal, water; the length of the agreement can vary but tend to be around 28 days; and users agree to comply with rules for behaviour and use of the site.

**9.11** The following table shows the number of unauthorised encampments in Newcastle-under-Lyme authority area in recent years.

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5 For more information see: [Negotiated Stopping](#)

**Table 10 Number of Unauthorised Encampments**

Unauthorised encampment activity: Newcastle-under-Lyme		
Number of encampments recorded February 2016 to June 2020	96 (2016=29; 2017=23; 2018=18; 2019=25, 2020 (to date = 1)	
Number of caravans	Mode (most frequently reported)	2
	Average	5
	Median	4
	Range	1 to 25

**9.12** There is currently no legal place for Gypsy's and Travellers to stop for a short term period in the Borough. A transit/stopover site comprising 3 pitches could accommodate up to 6 caravans and this would be sufficient to address the needs from 80% of encampments. In order to accommodate the maximum number of caravans reported on unauthorised encampments (25), up to 13 transit/stopover pitches would be needed. However, other mechanisms to accommodate the short term need of Gypsy and Travellers could be considered.

**9.13** Options for Transit Provision:

- I. Transit Site with 3 pitches
- II. Transit Site with 3-13 pitches
- III. Temporary stopover site
- IV. Negotiated stopping policy

### **Question 12**

**Do you have suggestions for potential Gypsy & Traveller sites which are deliverable?**

### **Question 13**

**Which option (I-IV above) should the Council use to address the need for transit provision?**



## 10 Other housing need

### Affordable Housing

**10.1** The Housing Needs Assessment produced by Turley's sets out the level of affordable housing need that is required in the Borough over the plan period. This was calculated in line with government guidance set out in Planning Practice Guidance (PPG) for Housing Needs of Different Groups. <sup>(6)</sup>

**10.2** Calculating the affordable housing need requires you to assess both the demand for affordable housing and estimate the supply of such homes to work out the residual need.

**10.3** In terms of demand; there are 829 households currently assessed in greatest need on the Council's housing register. A further need for circa 406 homes could also be expected to rise in each year of the emerging plan period. Combined these factors could generate a gross need for circa 455 affordable homes per annum over the emerging plan period (2020-40), with a particularly strong need for one bedroom properties and a lesser – but still notable – need for two or three bedroom homes.

**10.4** The PPG subsequently requires supply to be taken into account, allowing for lettings, the release of occupied affordable homes and committed supply for example. This indicates that approximately 427 affordable homes could become available annually over the plan period, which is below the estimated gross need to suggest a residual net need of 28 affordable homes per annum across Newcastle-under-Lyme.

**Table 11 Net Affordable Homes Calculation**

A) Demand	B) Supply	Residual need
455 dwellings per annum	427 dwellings per annum	A – B = 28 dwellings per annum

**10.5** Consideration has also been given to the potential role of different affordable products in meeting the need. The analysis indicates that affordable rent is the only product, of those assessed, to require a lower income than would be required to access the open market, which acts as the threshold below which affordable housing is assumed to be needed. Other products, such as shared ownership and discounted market sale, can nonetheless be expected to play a role in the functional housing market. However, as of 28<sup>th</sup> June 2021 First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

**10.6** The national minimum affordable home target applies to major development sites where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For such sites it is required that at least 10% of the homes are to be available for affordable home ownership. The level of affordable housing sought through the Local Plan can be higher if it can be robustly justified. This is partly dependent on the growth option selected, what component of the housing we intend to deliver that is classed as major development and with a robust assessment of viability. At present, there is little evidence to suggest that more affordable housing is required than the national minimum threshold, but this is dependent on the refinement of options in the Local Plan.

6 Ministry of Housing, Communities and Local Government [Housing Needs of Different Groups](#)

**Figure 12 Affordable Housing in Chesterton**



#### **Question 14**

**Should the Local Plan set an alternative target for affordable housing to the national minimum (10%), and how is this justified?**

#### **Question 15**

**Do you agree with the general ratio of 5% social rented, 2.5% first homes and 2.5% flexibility to make up the composition of affordable homes on qualifying sites?**

### **Housing for older and disabled people**

**10.7** The elderly population has grown by 16% in Newcastle-under-Lyme since the 2011 census. There are now an estimated 26,362 people aged 65 and over residing in the Borough, as of 2018, equating to 20% of all residents. This includes circa 11,972 residents aged 75 and over.

**10.8** Modelling by Edge Analytics indicates that recent growth is unlikely to slow over the emerging plan period, regardless of which option for growth is selected. Such projections can be used to identify the housing needs of older people. The Housing Needs Assessment predicts that circa 40-44 extra older residents are in need of bedspaces in communal accommodation each year. This is not accounted for in the general housing target (unlike sheltered and extra care housing), and therefore it must be considered how the Local Plan can boost the delivery of such accommodation.

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**10.9** The ageing population is also expected, alongside other factors, to increase the number of residents with disabilities, generating an associated housing need. 21% of all residents in the Borough were limited to some extent in their daily activities in 2011, but this increases markedly with age. Only 5% of those with the most limiting disabilities lived in institutional accommodation.

**10.10** The Housing Needs Assessment notes that while the major proportion of need is met by adaptation of existing homes, through Disabled Grant Facilities, for example, there is a growing need for suitably accessible private housing which is increasing as the population ages.

## **Specific needs of other groups**

### **Families with children**

**10.11** Those with dependent children are more likely to own their home although rental and social housing accommodation is still significant. Under any growth scenario they make up a major component of need and the demand for three bedroom homes is greater than any other housing type in the Borough.

### **Privately renting households**

**10.12** The Housing Needs Assessment notes that privately renting households are likely to grow in number given the projected growth in households such as unrelated sharing adults and families. This demand could be predominantly met by an increase in stock managed by private landlords.

### **Students**

**10.13** New or improvements to student accommodation has made up a high proportion of the housing delivery in recent years. Whilst Covid-19 has led to short term uncertainty, Keele University still has growth ambitions which would double its student population over the next 40 years. The University has also expressed a desire to increase the post-graduate accommodation on the campus at Keele. In the short-term, there is unlikely to be a substantial need for new accommodation beyond that already in the pipeline, and the evidence recommends continued dialogue with the University to determine any specific need.

### **Self-builders**

**10.14** Fifty individuals have joined and remain on the Council's self-build register since 2016. This is an extremely low proportion of the households in the Borough, but the Council are required to provide plots to meet the need.

#### **Question 16**

**How should the Local Plan help to deliver accommodation for older and disabled people and the specific needs of other groups?**

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## 11 Strategic Employment Sites

### What are Strategic Employment Sites?

**11.1** Strategic sites are large sites which measure more than 25 hectares (ha) in size. They are not associated directly with the growth of any particular settlement and would primarily (but not exclusively) serve to address regional shortfalls in supply (such as satisfying the requirements of the growing logistics sector), allied to in Newcastle-under-Lyme's case, the opportunity to take full advantage of the opportunities afforded by the presence of a well-regarded higher education facility. On this basis, such strategic sites are anticipated to make a significant contribution to the overall economic growth of the region.

**11.2** This consultation document seeks views on options of strategic sites in order to inform the emerging Local Plan for Newcastle-under-Lyme.

**11.3** Whilst no decisions have been made, two potentially deliverable options in the plan area are:

- Land South East of Junction 16, M6
- University Growth Corridor

### Economic Needs Assessment (ENA) 2020 – Evidence for Strategic Employment Sites

**11.4** Market activity has slowed in recent years, having peaked in 2015. In the case of industrial and warehousing premises, this slowdown has been driven by a lack of availability rather than reducing demand, with the most accessible parts of the study area – along the A500 and M6 – still viewed as premier locations for distribution in particular. This lack of deliverable land supply means that there is a regional need for strategic employment sites, and the construction of such sites would benefit the functional economic area of Newcastle-under-Lyme and Stoke-on-Trent. Availability rates for offices across the plan area have fallen to closely align with regional and national averages and rents have not inflated. In contrast, rents for warehouses have surged due to an extremely low availability rate. Further, availability rates have fallen for industrial premises, which has led to a rise in average rents.

**11.5** The current supply has been evaluated by Aspinall Verdi, based on criteria set by the Council, with sites ranked against 12 factors linked to their market appeal, physical characteristics and sustainability. This indicates that good or very good sites account only for around a third (97ha) of the current supply across Stoke-on-Trent and Newcastle-under-Lyme, with most sites instead considered to be relatively average. A similar process has been followed in assessing further sites identified by the Council, or submitted through the previous Call for Sites process, as offering the potential for future employment uses. A large proportion of the sites are in the Green Belt, and could only be released in the case of exceptional circumstances, and as an allocation through the Local Plan.

**11.6** Only 97ha of the current supply has been classified as good or very good, suggesting a potential shortfall of high quality employment sites – capable of adapting to changing market demands. The ENA states that the above information would provide the Council reason to identify additional employment land in the emerging plan to ensure sufficient flexibility and choice and ensure that the supply of land does not constrain the continued growth of the local economy.

**11.7** The analysis in the ENA identified a substantial and predominant need or demand for land suitable for the provision of warehousing premises, up to 169.4ha across Stoke-on-Trent and Newcastle-under-Lyme. This reflects forecast growth in sectors requiring such commercial floorspace as well as the substantial demand evidenced through recent levels of take-up.

**11.8** In considering the supply of available current employment land to meet this substantial need; it has been identified that whilst land remains available in the locations in which development of this nature has been coming forward in both Newcastle-under-Lyme and Stoke, such as Chatterley Valley, Etruria Valley/ Festival Park and Trentham Lakes, the remaining supply will not accommodate this local need in full. Even

where other sites judged to be suitable but less attractive to the market in other locations across the study area are considered, there remains a potential need for the Council to identify a new generation of site(s) to accommodate future need and demand. This also recognises key evidence of the wider national requirements for increasingly large building footprints which by necessity require larger sites and of a recognised strategic need for larger sites to be close to the M6.

**Figure 13 Nelson Business Estate, Kidsgrove**



## **West Midlands Strategic Employment Sites Study 2021**

**11.9** The West Midlands Strategic Employment Sites Study (WMSES) produced by Avison Young and published in May 2021, provides a high level overview on the availability of strategic employment land across the region. For some time there has been a lack of strategic employment land being promoted within the West Midlands. Prior to the WMSES study, there had been no region-wide assessment of strategic employment sites since 2015. This latest work proves the economic benefits of growth within this sector, and the need to ensure a resilient supply of land through the planning process.

**11.10** There is evidence that the Covid-19 global pandemic has had a positive impact on the need for large warehouses and distribution centres across the UK. Covid-19 and the associated national restrictions has led to an explosion in e-commerce, with retailers rapidly expanding their online platforms to meet demand. During the first half of 2020, take-up of large Grade A warehouses (9250+ sq.m) was up by 55% compared to the previous year. Whilst the greatest increase in demand has been for Big Box sites, there is a strong demand for mid-box and last mile logistics. The e-commerce sector for regional hubs, last-mile logistics operators and parcel delivery companies have placed increasing importance on smaller regional hubs as part of supply chains.

**11.11** The high level analysis in the WMSES Study indicates an urgent need to identify a pipeline of new strategic employment sites in the West Midlands to meet needs beyond the 7.41 years (or less) of supply that exists in allocations and committed sites.

**11.12** The WMSES invited stakeholders to submit details of particular land interests to the consultant team as part of the engagement process. Land at Junction 16 of the M6 motorway was promoted. This site measures 70ha in size. Applying the consistent assumption that 25ha of land can support 100,000 square meters (sq.m) of floorspace, this could equate to 280,000 sq.m of potential floorspace.



**11.13** Further, working alongside local authorities, Avison Young identified a number of pipeline sector specific sites, to be delivered through infrastructure led programmes. The sites identified focus on current growth sectors such as life sciences, digital and creative, advanced manufacturing and research and development. The Keele University Science and Innovation Park was identified as a site with potential to expand within its current sector of research and development.

## Land South East of Junction 16, M6

### 11.14 Location and Size

**11.15** The land being promoted to Newcastle-under-Lyme Borough Council is south east of Junction 16 of the M6 (J16 M6). It provides the opportunity for the construction of a major employment scheme. The site is approximately 70ha in size and has the potential to provide approximately 2.4million square foot (sq.ft) of employment accommodation, including multiple buildings in excess of 300,000sq.ft, with the largest building of approximately 1 million sq.ft, plus ancillary accommodation.

Opportunities	Potential Issues
Creation of 2700-3300 jobs in a fully occupied development, ranging from senior managers and directors to entry level jobs.	Permanent loss of Green Belt land.
Within the last 5 years, over 40 enquiries have been made in relation to occupying the largest forms of 'box units' across the Stoke and Newcastle area with none resulting in a deal. This is because sites with the required characteristics, scale and location, are not available. This shows that demand for such units in the region is high.	As the site is at a motorway junction, the workforce is not within immediate proximity. Sustainable Travel Plans can be created but the site is removed from current public transport routes and local service centres.
The site promoters consider that development of the site is deliverable from a technical perspective. There has been assessment of issues around highways and access, trees, ecology, ground and civil engineering, and landscape and visual effects. No issues have been identified that would prevent development at this site.	Permanent loss of a large area of Green Belt land. The scale of the site is likely to have a wide visual impact, albeit it must be taken into context with the existing motorway.
£125-170 million of Gross Value added per annum to the local economy.	Its location on the periphery of the authority boundary will attract a workforce beyond residents of the Borough, and its impact will also be felt beyond the Borough which would require consideration under the duty to cooperate.
The sites strategic location on the M6 provides an opportunity to develop an employment site which has the potential to serve as a national distribution centre.	The loss or potential moving of the lay by to enable access to the site is potentially problematic.



Opportunities	Potential Issues
The proximity to national road networks provides a large catchment area and accessibility to a large proportion of the UK's population and key markets.	Increase in HGV and personal vehicles to the area with resulting potential congestion and air pollution.
The site provides the unique benefit of the ability to serve requirements for the largest units of 300,000sq.ft +.	

**Map 2 Land south east of J16, M6 (Site reference: AB2)**



### Question 17

Do you think a strategic employment site should be allocated in the Local Plan?

### Question 18

Should site AB2 - Land south east of Junction 16 be considered for Green Belt release?

## Keele University Growth Corridor – Extension to the Science and Innovation Park

**11.16** A second strategic option for employment growth is extending the Science and Innovation Park attached to Keele University. Whilst this extension is not the scale of a strategic site on its own, it would be over 25ha in combination with the existing Science and Innovation Park which is still in the process of being developed.

**Figure 14 University Growth Corridor**



**11.17** The University Growth Corridor is located west of Newcastle-under-Lyme, approximately 3 miles from the town centre. The site comprises roughly 470ha of land to the north and east of Keele University, either side of the A525. The Growth Corridor comprises both housing and employment land, which is shown as concept 3 of the possible large scale extensions in the Spatial Strategy section (Chapter 11). The part of the site that could be considered for additional Green Belt release as an extension to the Science and Innovation Park is 18ha in size and located to the east of the existing campus.

**11.18** The proposed Growth corridor is bounded by Keele University and Keele Science and Innovation Park to the west, the village of Silverdale to the north, and suburbs of Newcastle-under-Lyme to the east.

**11.19** This site represents an opportunity for urban growth around an existing “anchor institution”, Keele University, and form a planned extension to the urban area of Newcastle-under-Lyme.

**11.20** It is expected that the Science and Innovation Park will largely be developed out within the ten year duration of the emerging University produced spatial masterplan, so to ensure the University has a continuous pipeline of development land, there is a need to look beyond the end of this period and consider further opportunities for growth. This area is currently designated as Green Belt.

**11.21** The University has suggested that this new area could follow similar guidelines to the existing Science and Innovation Park, focusing on a mix of Academic (40-45%), Commercial related to the University / Research & Development (40-45%) with the remainder available for additional University related residential accommodation including a Graduate Village linking to domestic developments to the south.

Opportunities	Potential Issues
Development supports the vision for growth of the University and the Keele Deal, expanding the number of students enrolled and creating new jobs around a regionally important academic institution.	Development of the site would result in a permanent loss of Green Belt land.

Opportunities	Potential Issues
Part of a masterplan for 1,000,000sq.ft of academic and business expansion. The location on the University Campus provides a unique opportunity to concentrate academics, research and development in a hub area which with resulting benefits from co-location and the reduced need to travel off campus for students and workers.	There are no statutorily designated sites, but there are several habitats identified as being of importance for the conservation of biodiversity. A landscape-led approach will therefore be integral to the new development within the landscape.
The University will become Europe's first demonstrator facility for smart energy and is expected to attract world-leading researchers, which will in turn stimulate demand for courses across the Faculty of Natural Sciences, increased the student base by 50% by 2040. Opportunity to utilise University led renewable energy and sustainable transport projects.	There are areas of built and natural heritage which will require additional care. The University campus contains Listed Buildings and a large area of Historic Parks and Gardens. The Growth Corridor occupies an area of undulating topography with areas of higher ground divided by small valleys. A number of woodland blocks provide some visual enclosure, however, there are potentially areas of visual sensitivity that will require visual mitigation including additional landscape structure planting.
Supports proposed Strategic Objectives SO-II and SO-X relating to economic and University growth and aligns with the proposed vision.	The impact of additional traffic on Keele Road will require mitigation to avoid excessive congestion and air pollution.
Close to the centre of Newcastle with opportunities to utilise and enhance current public transport provision.	An existing overhead high voltage line crosses the site. Required clearance of 20 metres to each side and the negative visual impact of powerlines represents a constraint. Burying the powerlines in land east of Keele Science and Innovation Park is considered essential.
The continual investment in the growth of Keele University by external funding sources such as the Local Enterprise Partnership makes this a highly deliverable site.	
The whole site is located in Flood Zone 1 (less than 0.1% probability) and therefore has no planning constraints associated with flood risk.	

**Map 3 Keele University Growth Corridor Extension to the Science and Innovation Park (Site reference: KL15)**



**Question 19**

Should site KL15 - Land to the south and east of new development site, Keele University be considered for Green Belt release?



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## 12 Development Boundaries

**12.1** The role of the development boundary is to define the built limits of a settlement and differentiate between what is the built form of a settlement where the principle of development is usually acceptable and the countryside where development is strictly controlled. Development boundaries guide development to sustainable locations demarking a concentration of existing residential and employment premises and services and facilities. In addition, they provide clarity and certainty for developers and the general public by highlighting the areas which, in principle, will be more acceptable than others for additional built development. In the current development plan the development boundaries have traditionally been referred to as village envelopes, however as the boundaries also apply to the extent of the towns it is more appropriate to redefine these as development boundaries.

**12.2** A policy on development boundaries will be included in the Local Plan. In the instance that new site allocations are proposed at the edge of a current boundary, it is proposed that the boundary is redrawn to show that the principle of development in that location has been established through the Local Plan.

**12.3** Development boundaries can only be reviewed through the Local Plan or through Neighbourhood Plans. Major modifications were undertaken in the Loggerheads Neighbourhood Plan to Loggerheads and Ashley, but other than these villages the development boundaries have not been reviewed in detail for some time. It is proposed that amendments to development boundaries could be undertaken through the Local Plan process by re-examining the boundaries to check whether they still align with the following principles:

### **12.4** Key principles

1. The development boundary will be tightly defined around the built-form of the village and where possible follow defined features such as boundary features to the built-form (walls, fences, hedgerows) and roads and other main transport corridors which separate the built-form from the open countryside.
2. The development boundary will include the following:
  - a. Existing commitments, i.e. allocations, unimplemented but extant planning permissions and sites under construction where they form a continuous part of the village;
  - b. The curtilages of buildings which closely relate to the character of the built-form, have enclosing features and are separated from the open countryside; and
  - c. Previously-developed land (as defined in NPPF) which stands on the edge of the built-form and is not physically or visually detached from the village.
3. The development boundary will exclude the following:
4.
  - a. Open spaces, outdoor sports and recreation facilities, allotments and cemeteries which stand on the edge of the built-form of the village;
  - b. Isolated development which is physically or visually detached from the settlement including rural exception sites;
  - c. Sections of large curtilages of buildings which relate more to the character of the open countryside than the built-form;
  - d. Buildings and land in agricultural, forestry, equestrian, minerals, landfill and public utility (reservoirs, waste water treatment works, substations) use which stand on the edge of the built-form of villages;
  - e. Buildings of a temporary nature on the edge of the built-form of villages; and
  - f. Camping and caravanning sites, including pitches for gypsy, travellers and travelling showpeople, except where there is approval for year round permanent residential use.

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### **Question 20**

**Do you agree with the key principles of development boundaries?**

### **Question 21**

**Do you think the development boundaries should be reviewed? If so, through the Local Plan or through Neighbourhood Plans?**



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## 13 Retail/Town Centre Regeneration

**13.1** Newcastle-under-Lyme has a hierarchy of retail centres, ranging from rural centres to strategic centres. These areas provide the local community with a range of shops, services and facilities. Strategic centres provide a role for the wider Borough whilst town centres, local and rural centres and neighbourhood centres are more tailored to the needs of the local communities. In Newcastle-under-Lyme, 18.9% of residents work in the 'Retail trade; repair of motor vehicles and motorcycles' category. Therefore, ensuring the success of these areas is a key part of the Local Plan.

**13.2** The NPPF states that planning policies should promote the long-term vitality and viability of retail centres by allowing them to grow and change in a way that can respond to changes in the retail and leisure industries. Planning policy should also allocate a range of sites in retail centres which will meet the scale and type of development likely to be needed for at least the next ten years.

**13.3** Newcastle-under-Lyme Borough Council commissioned the 2019 Retail and Leisure Study with the aim of establishing the current position in respect of the need for additional retail and leisure facilities in the plan area and consider the vitality and viability of the Borough's defined centres. The study provides recommended town centre boundaries, as well as the proposed list of the hierarchy of centres which is set out earlier in the plan in section 7.

**13.4** It is important that the Local Plan provides scope for the changing retail scene. High streets are continuing to face high levels of competition from online e-retailers and out-of-town shopping centres. The already quick-changing retail climate has only been exacerbated by the Covid-19 pandemic. Therefore, it is essential that the Local Plan ensures that the necessary range of facilities needed for the local community is present in all retail centres. The Local Plan also needs to ensure that alternative uses are considered for retail units and/or areas which have closed will help to ensure the vitality of the area as well as the retention of jobs.

**Figure 15 Markets**



### Funding

**13.5** The Town Deal Vision for Newcastle, through the Town Investment Plan (TIP), has secured £23.6million in funding from central government, additionally £11million has been secured through the Future High Streets Fund to boost the Council's ambitious plans to regenerate the town centre of Newcastle-under-Lyme. The funding received from central government will be matched from other sources

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to create an investment totalling roughly £135million. The TIP will generate an increase of more than £69 million a year in increased gross value added (GVA) for the area; a £2.3 million uplift in land values and will enable the regeneration of communities across the borough.

**13.6** The Newcastle TIP sets out in three key objectives, with projects aligned to them, how the Town Deal funding will be spent, what it will achieve and how the £23.6million will bring in other investment to the area:

- ***Objective 1 – Open up growth opportunities through enhanced physical and digital connectivity aligned with clean and sustainable economic development.***
  - **Smart Newcastle Digital Connectivity** new digital infrastructure will give better access to services, employment and other digital services for residents and businesses.
  - A new **Digital Society Centre** will help improve digital skills for our communities and will provide grow-on space for businesses, building on the Smart Newcastle Digital Connectivity Project.
  - **Sustainable public transport solutions** will allow investment in a new sustainable bus fleet to provide low carbon buses to reduce emissions and address air quality issues in Newcastle. All existing bus shelters will be upgraded to become SMART and solar powered, use real time passenger information (RTPI), have USB charging points and LED shelter lights, all powered by a solar panel. This will include routes through Keele University, Royal Stoke Hospital and all bus shelters across Knutton, Chesterton and Silverdale.
  - **Town Centre Permeability** will see investment in upgrading the crossing on Barracks Road and improving town centre cycle access routes. Outside of the ring road, the project would include resurfacing, a new footbridge and wayfinding signage. The project will lead to a co-ordinated walking/cycling corridor between Keele University and Newcastle town centre, improving sustainable transport connectivity.
  - A new **Electric Charging Infrastructure** across the borough will support the transition to electric vehicles by 2030, and help address air quality issues in transport corridors.
- ***Objective 2 – To diversify and enhance the town centre experience by encouraging new uses to increase demand, footfall and boost the dwell time of residents and visitors.***
  - A new **Digital Society Centre** in the town centre will provide space for SMEs to improve skill levels including areas such as digital skills, data analytics and artificial intelligence. The centre will bring together the assets of Keele University, and the Newcastle and Stafford Colleges Group, and will complement the proposed town centre-based “Institute of Technology” as well as the “Living Lab” in Keele’s new IC7 Innovation centre.
  - **Investment in town centre gateways** will include the demolition and redevelopment of the former Zanzibar nightclub by Aspire Housing and the demolition of the Midway multi-storey car park to make way for new homes for key workers and young professionals as well as extra care accommodation.
  - The **Astley Centre for Circus and Performing Arts** will be a new, dedicated Centre for Circus in the town centre that will open up opportunities in creativity, education, tourism and heritage and build on the reputation of the town for culture and heritage.
- ***Objective 3 – To channel investment into regenerating communities, ensuring these areas are sustainable places to live and provide residents with the infrastructure needed to improve their quality of life.***

- **Putting the Heart back into Knutton** with Town Deal funding allowing the first stages of the Knutton Masterplan with the delivery of 240 new homes, improvements to business accommodation, a new village hall and village green and improvements to road safety.
- Like Knutton, **Town Deal investment in Chesterton** will enable delivery of high quality, housing for the local community linking to Aspire Housing's wider estate regeneration plan to improve the existing housing.

**13.7** The £11million worth of funding secured through the Future High Street Fund will boost the Council's ambitious regeneration plans. These include:

- Demolition of the former Civic Offices and the significant redevelopment of the whole Ryecroft site as a key anchor-site for the town. This will comprise a mix of employment and residential uses, a new multi-storey car park, new public spaces and better pedestrian and cycle connectivity with the residential areas north of the town centre.
- The creation of a series of linked, spacious and modern town centre plazas and public spaces.
- An improved street market with a community event space in High Street – the heart of the town.

**13.8** The Town Deal for Kidsgrove is an exciting and unprecedented opportunity to bid for significant investment to facilitate future economic growth. The [Kidsgrove Town Investment Plan](#) (TIP) was submitted on 30 October 2020. One condition of the Town Deal was that Kidsgrove set up a Town Deal Board to develop and agree a well-evidenced Town Investment Plan, which sets out a clear understanding of the area, focusing on its assets, opportunities and challenges. The Kidsgrove Town Deal Board brings together representatives from the public, private, voluntary, education and community sectors, all with the common aim of securing as much funding as possible to bring transformational economic benefits to the area. The Kidsgrove Town Deal Board was delighted to be informed on 3 March 2021 that Kidsgrove had been made an offer of £16.9m to deliver the projects contained in the TIP. The regeneration of Kidsgrove through a range of projects will make it a more desirable place to work, live, visit and invest. The Board agreed that the Sports Centre would be a 'fast track' project, which means that we were able to submit all the paperwork early so that the funding could be released and work could begin straight away. The other project confirmation forms were submitted on 17th May 2021 and we now have 12 months in which to provide a detailed 'Business Case' for each project.

**13.9** Following consultation with board members and a 'Call for Projects' from the public and other local stakeholders, over 25 project ideas were submitted. These were scored against a number of factors such as deliverability, cost, fit with local strategies and whether they met the requirements of the MHCLG guidance using a [prioritisation approach](#) devised by AECOM and approved by the Board. However, three main objectives stand out for Kidsgrove which incorporate different projects. These are:

- ***Objective 1 – To drive growth and opportunity through enhanced enterprise infrastructure in Kidsgrove***
  - Chatterley Valley West represents the only strategic employment site in Kidsgrove and the wider Borough. The 38ha site could drive inward investment to Kidsgrove and generate 1,940 jobs and £72 million GVA per annum in the local area once developed. However, the ground conditions linked to the area's coal mining heritage, means that there are high upfront costs to develop the site so Town Deal funding is required to deliver site access and associated water main diversions, to de-risk the site and allow it to be brought forward.
- ***Objective 2 – To create a connected, accessible town centre***
  - Kidsgrove station - Delivery of a new, modern station building, a new multi-modal interchange, and 200-space car park, with improved access to the Trent and Mersey Canal which runs adjacent to the rail station.

- Investment along the Trent and Mersey Canal at Kidsgrove – A safe, attractive canal corridor and an alternative off-road route to benefit both visitors and the residents of Kidsgrove with continuous sealed pathway, lighting and attractive public realm.
  - A town centre shared service hub – providing a modern facility that brings together key public sector assets, including a Health Hub, library and Job Centre. The Hub will provide a one-stop-shop from which residents can access these services and will link to a satellite youth centre which will provide activities and services for young people such as careers advice and guidance. The land take for the Hub will also be used to define a clear route to link Kidsgrove Station through to the town centre.
- **Objective 3 – To maximise the leisure and recreation opportunities available in Kidsgrove**
    - Investment in Kidsgrove Sports Centre – The refurbishment and re-opening of the dry and wet-side facilities at Kidsgrove Sports Centre, to be managed by the local community. Town Deal investment will address the community's priorities; transform the town's leisure facilities; and replace a symbol of under-investment in Kidsgrove with a modern and community-led facility.

**13.10** The Board and the Borough Council now have 12 months to develop and submit detailed business cases for each project. Initial work has started on business cases for Kidsgrove Station and Chatterley Valley West, with the Shared Service Hub and the canal enhancement project to follow. The Business Case for the Sports Centre has already been submitted to MHCLG and approved and the rest of the work is now underway, with an anticipated completion of Spring 2022.

**Figure 16 Wolstanton Retail Park**



## Town Centre Boundaries

**13.11** Paragraph 86 of the revised NPPF required local planning authorities to 'define the extent of town centres and primary shopping areas'.



**13.12** Annex 2 of the NPPF indicated that a primary shopping area is the ‘defined area where retail development is concentrated’. Annex 2 also identifies that a town centre is the ‘area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area’.

**13.13** The 2019 Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Retail and Leisure Study sets out recommendations for altering the town centre and primary shopping area boundaries, outlined below.

**13.14** The findings of the Retail Study indicate a clear need to attract further investment, operators and activity to the retail/town centres in the Local Plan area. The current vitality and viability of most of the principal centres is of significant concern and planning policy must be applied carefully in order to help return them to better health and deliver regeneration opportunities.

**13.15** Paragraph 86 of the National Planning Policy Framework (NPPF) requires local planning authorities to ‘define the extent of town centres and primary shopping areas’.

**13.16** In line with this guidance, it is necessary for the retail/town centre boundaries to be reviewed as part of the emerging Local Plan. Doing so will ensure the vitality of these centres and aid investment going forward.

**Table 12 – Retail and Leisure Study town centre boundary recommendations**

Area	Recommendation
Newcastle-under-Lyme	<p>Amend to include the area within Lower Street/Ryecroft and Barracks Road.</p> <p>This amendment represents a substantial reduction to the previous town centre boundary, which included a number of non-town centre uses.</p> <p>The proposed primary shopping area includes units on High Street between Church Street and Friars’ Street/Hassell Street (including the Roebuck Shopping centre), Castle Walk and Iron Market. This area comprises predominantly retail uses, in accordance with the NPPF guidance.</p>
Kidsgrove	<p>Reduced from the current extent of Kinnersley Street/ Back Heathcote Street/ Queen Street/ Whitehall Avenue to include the areas within Kidsgrove which principally comprise main town centre uses.</p> <p>The recommended change to the boundary should run along the northern boundary of Home Bargains and its car park on Heathcote Street, and exclude the car park to the east of King Street.</p> <p>The previous boundary for Kidsgrove included a relatively extensive area of residential and other non-main town centre uses to the north, which is recommended to be removed in accordance with the NPPF definitions.</p>

**Figure 17 Newcastle existing and recommended town centre boundaries**



**Figure 18 Kidsgrove existing and recommended town centre boundaries**





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## Impact Assessment Threshold

**13.17** Paragraph 90 of the NPPF states that it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail and leisure developments that should be the subject of an impact assessment. Any such threshold policy applies only to the impact test (all planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan will generally be the subject of the sequential test).

**13.18** The purpose of applying an impact threshold within the development plan which deviates from the national threshold of 2,500sq.m, is to allow the Council to retain appropriate control in respect of the potential for development to impact on the future health of defined centres within the two authority areas. By applying a lower threshold, applications for developments which could potentially have a harmful effect on the overall vitality and viability of a defined centre, will need to be supported by a proportionate impact assessment which sets out the potential trade diversion impact assumptions.

**13.19** The Retail Study 2019 sets out a justification to support that a lower threshold should be applied across the hierarchy of centres within the authority area of Newcastle-under-Lyme.

**13.20** The Retail Study 2019 has categorised the retail centres in Newcastle-under-Lyme in to tiers. These are as follows:

- Tiers 1 and 2 – City and Town Centres (Newcastle and Kidsgrove)
- Tiers 3, 4 and 5 – District, Local, Rural and Neighbourhood Centres

**13.21** The Retail Study 2019 states that an impact assessment will be necessary to accompany proposals for retail and leisure uses (including those relating to mezzanine floorspace and the variation of restrictive conditions) which are not located within a defined centre where:

- The proposal provides a gross floorspace in excess of 500sq.m gross; or
- The proposal is located within 800 metres (m) of the boundary of a District, Local or Neighbourhood Centre (Tiers 3, 4 and 5) and is in excess of 200sq.m gross.

### Question 22

**What would you like to see on your local high street?**

### Question 23

**What should the Local Plan do to enhance the vitality & vibrancy of the Borough's retail centres?**

### Question 24

**Do you agree with the recommended changes to the town centre boundaries?**

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## 14 Pollution, Water and Environmental Quality

**14.1** Adverse pollution, water and environmental quality can negatively impact on quality of life. High levels of pollution and poor water and environmental quality can also contribute to climate change, as well as a detrimental effect on biodiversity, water supply, open space and the natural environment.

**14.2** The Council aims to minimise pollution and the impacts of climate change, whilst improving water and environmental quality across the Borough.

### Air Quality

**14.3** Air quality has been monitored in the Borough of Newcastle-under-Lyme over the last twenty years, by using Nitrogen Dioxide (NO<sub>2</sub>) diffusion tubes and an automatic monitoring station, which monitors real time concentrations of Nitrogen Dioxide in the air. This substance is monitored because it is found in vehicle exhaust fumes, which is the main source of pollution within the Borough.

**14.4** In 2015 four geographical areas of the borough were declared as Air Quality Management Areas (AQMA) due to exceedances of objective levels of Nitrogen Dioxide. Air quality management areas are areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

**14.5** These areas include Newcastle Town Centre, Maybank, Kidsgrove and Little Madeley. With the input of other sectors (i.e. Highways England, Staffordshire County Council) Air Quality Action Plans (AQAP) for each AQMA are now in place to address the different ways in which levels of pollution can be reduced by managing traffic more efficiently, and encouraging walking, cycling, and the use of public transport across the borough.

**14.6** In October 2018, Stoke-on-Trent and Newcastle-under-Lyme were issued a Ministerial Direction to produce a joint air quality plan to address their respective nitrogen dioxide issues. The Councils have submitted a mitigation plan which includes bus gates, specific traffic management, bus infrastructure and transport improvement along certain routes. As a result of a separate direction the Council is also implementing the retrofitting works to upgrade the busses that operate on the A53 from euro 3 engines so they operate at euro 6 standards which will aid the reduction of Nitrogen pollution.

**14.7** The NPPF states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA's) and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.

**14.8** The Council will consider the impact of any proposed development through the Local Plan on air quality, both from individual proposals and cumulatively.

### Question 25

**Is a Local Plan policy on air pollution required? If so, what should a policy on air pollution contain?**

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## Water Quality

**14.9** New development requires the provision of clean water, safe disposal of wastewater and protection from flooding. It is possible that allocating new developments at some locations may result in the capacity of the existing available infrastructure being exceeded. This situation could potentially lead to service failures to water and wastewater customers, have adverse impacts on the environment or cause the high cost of upgrading water and wastewater assets being passed on to bill payers. Climate change presents further challenges such as increased intensity and frequency of rainfall and a higher frequency of drought events that can be expected to put greater pressure on the existing infrastructure.

**14.10** The Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Water Cycle Study published in January 2020 will be used to assist the Council to select and develop sustainable development allocations where there is minimal impact on the environment, water quality, water resources, infrastructure, and flood risk. This will be achieved by identifying areas where there may be conflict between any proposed development, the requirements of the environment and by recommending potential solutions to these conflicts. The Water Cycle Study was carried out in co-operation with Severn Trent Water, United Utilities and the neighbouring Local Planning Authorities (LPAs).

**14.11** The Water Framework Directive (WFD) Regulations (2003) provide a legal framework for the protection, improvement and sustainable use of water bodies across Europe. Objectives of the WFD include the protection and improvement of water bodies, reduce water pollution, conserve habitats, and promote sustainable use of water. The WFD supports a catchment based approach to managing the water environment through separate 'River Basin Management Plans'. All Local Authorities have a legal duty to take River Basin Management Plans into consideration during the determination of planning applications. Newcastle-under-Lyme comes under the Humber and North West River Basin Management Plans.

**14.12** The NPPF sets out several recommendations in relation to water quality and management which can be used when determining planning applications.

**14.13** Paragraph 20 states "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for ... infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy.

**14.14** Paragraph 34 states "Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

**14.15** Paragraph 174 states "Planning policies and decisions should contribute to and enhance the natural and local environment by ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

**14.16** The Council will consider the impact of any proposed development through the Local Plan on water supply and quality, both from individual proposals and cumulatively.

### Question 26

**Is a Local Plan policy on water quality required? If so, what should a policy on water quality contain?**

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## Environmental Quality

**14.17** The quality of the surrounding natural environment directly affects health and plays a major role in quality of life, years of healthy life lived, and health disparities.

**14.18** The Environmental Protection Act 1990 was produced to help counteract the air, water and land pollution which came about as a result of the industrial revolution. The North Staffordshire region was a significant centre of industry. However, the economy developed with little regard for environmental impacts. This attitude persisted until the mid-1970s, when it became apparent that legislation was needed to protect the environment.

**14.19** As a requirement of the statutory guidance, the Council has produced a Contaminated Land Strategy, which provides further information on:

- The legislative background to contaminated land.
- Information on the Borough of Newcastle-under-Lyme.
- The methodology adopted by the Council to identify and prioritise potentially contaminated land.
- How the requirements of Part 2A (of the 1990 Environmental Protection Act) will be implemented by the Council.

**14.20** While the government and the Council seek to encourage the development of brownfield sites (previously developed sites) in preference to greenfield sites, any risk from land contamination must be properly addressed. Land contamination is also a material planning consideration under the National Planning Policy Framework.

**14.21** The NPPF sets out recommendations in relation to environmental quality which can be used when determining planning applications.

**14.22** Paragraph 174 of the NPPF states that “Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

**14.23** Paragraph 185 of the NPPF states that “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

**14.24** The Council will consider the impact of any proposed development through the Local Plan on the quality of the natural environment, both from individual proposals and cumulatively.

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### **Question 27**

**Is a Local Plan policy on environmental quality required? If so, what should a policy on environmental quality contain?**

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## 15 Development Management Policies

**15.1** Local Plans should set out strategic policies necessary to address the strategic priorities of the area and which look ahead over a minimum 15 year period from adoption. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. Often it is better for these to be set in Neighbourhood Plans. The Local Plan should not set local policies which are duplicated by national policy in the National Planning Policy Framework.

**15.2** This section presents topic areas which could be developed into policies included in the Local Plan. This is intended to provide an indicative list and is not exhaustive, as the response to this consultation will influence the final list of policies which will be required.

### Design

**15.3** High quality designed places are at the heart of what the Local Plan seeks to achieve. The Council holds the Civic Awards biannually which aim to promote better design in buildings and development of land in Newcastle-under-Lyme and to recognise their contribution to improving the Borough. The Council and the Civic Society worked together with the community to promote the importance of places and good design. The Civic Society disbanded in 2020, meaning Newcastle-under-Lyme Borough Council will continue this work alone.

**15.4** National policy promotes high quality design with a dedicated section in the National Planning Policy Framework. It states a set of criteria for which development policies or decisions should ensure are achieved. It recognises that engagement between applicants, local communities, local planning authorities and other interest groups is key to achieving well designed places. The National Design Guide published in 2021 illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

**15.5** The Building Better, Building Beautiful Commission, published in January 2020, was an independent body that advised government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods. The commission had 3 primary aims:

- To promote better design and style of homes, villages, towns and high streets, to reflect what communities want, building on the knowledge and tradition of what they know works for their area.
- To explore how new settlements can be developed with greater community consent.
- To make the planning system work in support of better design and style, not against it.

**15.6** In July 2021, the National Planning Policy Framework was updated to reflect the Building Better, Building Beautiful Commission. It supports the recommendation for an explicit focus on beauty in planning policy to ensure the planning system can both encourage beautiful buildings and places and help to prevent ugliness when preparing Local Plans and taking decisions on planning applications. Local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code and which reflect local character and design preferences.

**15.7** The NPPF has also been updated to give communities greater say in the design standards set for their area. This reflects the Government's proposals for a National Model Design Code, which will include a model community engagement process, and will create a framework for local authorities and communities to develop a more consistent approach which reflects the character of each place and local design preferences. It also clarifies that the National Design Guide and the National Model Design Code should also be used to guide decisions on planning applications in the absence of locally produced guides or codes.



**15.8** The NPPF makes clear that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. In addition, it clarifies that significant weight should be given to development which reflects local design policies and government guidance on design.

**15.9** National Planning Policy Framework states that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. In this respect, the Council consider that the most appropriate level for specific design criteria policies should be set in Neighbourhood Plans, and that in general, the criteria set in national policy is sufficient to set guiding principles for good design.

### **Question 28**

**Do we need additional measures in the Local Plan to support national policies and guidance including the National Model Design Code on the design of development?**

#### **Thinking Points:**

- Are there any Borough specific priorities or design related issues the Local Plan should address?
- Are more specific policies needed focusing on particular types of development (e.g. housing)?
- Should standards such as BREEAM (a recognised best-practice measure for a buildings environmental performance) be applied to the construction of non-residential schemes?

## **Natural Environment and biodiversity**

**15.10** Newcastle-under-Lyme Borough Council produced the Biodiversity Opportunity Mapping Report in conjunction with Staffordshire Wildlife Trust in 2014. Biodiversity Opportunity Maps are produced to show where priority habitats could be enhanced, restored or created in a particular area, as a basis from which to develop policies.

**15.11** This map encompasses the whole of Newcastle-under-Lyme and covers approximately 21,030ha. During the mapping process, elevation, topography, landscape, geology and natural process such as river systems were considered.

**15.12** Eight biodiversity opportunity zones were identified within the Borough of Newcastle-under-Lyme. These are:

- River Valley Mosaic
- Grassland
- Meres and Mosses
- Woodland (including sprinks, drumbles and wet woodland)
- Brownfield (open mosaic habitats on previously developed land)
- Urban Mosaic
- Inner Urban Core
- Town Centre

**15.13** The biodiversity opportunity map for Newcastle-under-Lyme forms an essential part of establishing how a planning proposal can contribute appropriate maintenance, enhancement or restoration for local biodiversity. The map can also act as part of the Local Plan evidence base.

**15.14** The NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) and by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

**15.15** The NPPF also states that to protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

**15.16** The Council intends to update the evidence base with ecological network recovery mapping for the Borough. This evidence can be used to determine where improvements to ecological sites and habitats would be beneficial.

**Figure 19 Bathpool Park**



### **Question 29**

**Do you agree that the Local Plan should set out identified areas for ecological recovery?**

#### **Thinking Points:**

- Is there anything else a local biodiversity policy should address? for instance, should the Local Plan require more than 10% biodiversity net gain & if so, how could this be justified?
- Are there any other elements of biodiversity net gain that should be reflected such as appropriate metrics to use?
- How should off-site compensation measures be co-ordinated and/or located?

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## Historic Environment

**15.17** The Borough has a rich historic environment with many valued significant assets consisting of a range of designated and undesignated heritage assets. The Borough's historic environment and heritage assets contribute to the local distinctiveness and character which is special and diverse. Such heritage assets are vulnerable to change and potential harm, and therefore should be managed proactively and sensitively, and should be protected and enhanced in a manner appropriate to their significance.

**15.18** Such heritage assets include Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments as well as undesignated assets such as Locally Listed Buildings and Sites of Archaeological Potential. There are 381 Listed Buildings and Structures in Newcastle-under-Lyme. Of these, 3 are Grade I, 25 are Grade II\* and 353 are Grade II. There are 13 Scheduled Ancient Monuments in the Borough and 2 Registered Parks and Gardens at Keele and Maer.

**15.19** Newcastle-under-Lyme Borough Council also hold a Register of Locally Important Buildings and Structures. Local heritage lists are compiled by local authorities to identify historic buildings and structures which have not been given a formal designation by Historic England, but are considered to be of significant local importance, enough to have material consideration in the planning process. Newcastle-under-Lyme's Register of Locally Important Buildings and Structures was last updated in 2020 and includes 135 buildings or structures.

**15.20** Newcastle-under-Lyme Borough Council also conduct a Buildings at Risk Survey. The most recent of which in 2016 identified 14 buildings of being "at risk", eight of these being retained from the previous survey, with the 2016 survey adding six more buildings and structures to the Register.

**15.21** There are 21 Conservation Areas which have the purpose enhancing or preserving the character and appearance areas that are of special architectural or historical interest. The Borough Council has produced 11 Conservation Area Management Appraisals which defines the special interest of the conservation area that merits its designation and describes and evaluates the contribution made by the different features of its character and appearance. The Council has also made 12 of Article 4 designations which allow the council to remove and make certain restrictions on the kind of alterations allowed, depending on how it might affect the area's character. This affects things like porches, changing historic doors and windows and other distinctive architectural features and removing or putting up walls, gates or fences.

**15.22** Staffordshire County Council adopted a Planning for Landscape Change Supplementary Planning Guidance document in 2001. This is intended to guide decisions which may affect the conservation, enhancement and restoration of rural landscapes in the county.

**15.23** The NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

**Figure 20 Guildhall**



### **Question 30**

**Is a Local Plan policy on heritage required? If so, what should a policy on heritage contain?**

#### **Thinking Points:**

- Should it address issues such as conservation areas, archaeology, listed buildings and heritage at risk, as well as consider the setting of historic buildings and the wider historic landscape?
- What measures are most appropriate to sustain, enhance, and avoid harm to, the significance of heritage assets?

## **Flood Risk**

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

**15.25** The Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment identifies surface water flood risk in the Borough, predominantly within the urban areas of Newcastle and Kidsgrove as a result of rapid urbanisation, and where smaller watercourses were culverted, and in some cases, built over. The urban

area of Newcastle and Silverdale were recognised in the local FRM Strategy as being one of the top ten urban areas at risk of surface water flooding in the county, with an estimated 632 properties at risk. Kidsgrove has known issues with the capacity of the sewer network. Areas that have seen the highest occurrences of sewer flooding are the most densely populated, in particular Kidsgrove, Talke, Audley and Bignall End. Rural areas that have been impacted by sewer flooding include Madeley and Betley.

**15.26** The NPPF states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

**15.27** The NPPF also states that strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

**15.28** National planning policy sets a clear sequential test to guide development to areas at least risk of flooding and it not necessary to repeat this in the Local Plan. The Council intends to follow the sequential test when considering any site allocations. The SFRA recommends that a Local Plan policy could:

- Take a risk-based approach to the allocation and design of developments in flood risk areas;
- Developers should assess the condition of existing assets and upgrade, if required, to ensure that the infrastructure can accommodate pressures/flows for the lifetime of the development;
- Protect and promote areas for future flood alleviation schemes;
- Mitigate against residual risk, improved emergency planning and flood awareness;
- Implement sustainable drainage systems as standard on all developments;
- Enhance and restore river corridors and habitats;
- Improve emergency planning and flood awareness;
- Apply policies on cumulative impacts.

### Question 31

**What are your perspectives on the policy approach advocated in the 2019 Strategic Flood Risk Assessment?**

#### Thinking Point:

- What other specific mitigation measures or strategies could be applied in the Local Plan to address flood risk management?

## Open Space

**15.29** Newcastle-under-Lyme Borough Council formally adopted the Open Space Strategy and Green Infrastructure Strategy in March 2017 and this is currently in the process of being reviewed to account for the different growth targets. The Open Space Strategy is a review and future guide to how the Borough Council manages its open space asset base to ensure the needs of the community are met in the most appropriate way. It also addresses land outside of the Council's ownership, with the intention that it is managed in a complementary way to land managed by the authority.



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**15.30** The Green Infrastructure Strategy is a guide to planning and implementing green infrastructure across the Borough. Four challenges have been identified to be addressed through the Green Infrastructure Strategy. These are:

- working with growth;
- meeting public demand;
- making Green Infrastructure central to the future economy, and;
- improving the Green Infrastructure network and its connectivity.

**15.31** To address these challenges four strategic objectives have been identified: securing quality of place and positive development; enabling healthier lives and stronger communities; capturing the benefits of Green Infrastructure for all and making the Borough more resilient and biodiverse.

**15.32** The enhancement and protection of green infrastructure can increase bio-diversity, improve health and well-being, enhance an area's heritage value, link rural and urban areas and can improve the quality of life for communities.

**15.33** The NPPF states that plans should enable the retention and development of accessible local services and community facilities, such as open space. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of open space.

**15.34** The NPPF also states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. National policy sets out specific criteria when assessing applications to prevent the loss of open space.

**15.35** The Borough Council considers a local policy on open space would clarify the level of open space provision required in new development.

**Figure 21 Brampton Park**





## Question 32

**Do you agree that an open space policy should set out open space provision requirements in new development?**

### Thinking Points:

- Would it be valuable to make clear the approaches to its management & maintenance and establish parameters for its design & location?
- How can the concept of Green Infrastructure be best reflected in the Local Plan?
- Could any local green space (as defined in paragraphs 101-103 of the NPPF) justify inclusion as a designation in the Local Plan?
- Is there anything else that a local policy on open space should contain?

## Transport

**15.36** The Borough has a well defined transport network and benefits from being located adjacent to the strategic highway network of the M6 motorway and the A500. There is a train station in Kidsgrove but the nearest station to Newcastle-under-Lyme is Stoke Station. The HS2 network is set to pass through the Borough with Crewe as the nearest station in neighbouring Cheshire East.

**15.37** Staffordshire County Council are responsible for highways and transport planning in the Borough. The Staffordshire Local Transport Plan was adopted in 2011 and sets out the county transport plan to 2026. It incorporates Newcastle-under-Lyme and sets out the County Council's proposals for transport provision in the county, including walking, cycling, public transport, car-based travel and freight, together with the management and maintenance of local roads and footway. Accessible public transport is key to sustainable development in the Borough. Public satisfaction levels with travel information in Staffordshire is low at 38%, placing the county ninth out of the county's ten nearest neighbours.

**15.38** The NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed and so that opportunities to promote walking, cycling and public transport use are identified and pursued.

**15.39** The Council intends to consider any impact on the transport network when undertaking the site selection process, and to work with Stoke-on-Trent City Council, and Staffordshire County Council to model the impact of proposed sites on the wider transport network to determine what mitigation may be required.

**15.40** In line with the Climate Change declaration and national initiatives the Council also seeks to investigate the potential for all new developments to contain electric charging points to enable all new residents and business owners to ensure that this infrastructure does not require retrofitting in future.

**Figure 22 Newcastle Bus Station**



### **Question 33**

**Is a Local Plan policy on transport required? If so, what should a policy on transport contain?**

#### **Thinking Points:**

- What is the best approach to promote sustainable transport and movement, including the provision of networks to facilitate increased use of cycling, walking and public transport?
- Should anticipated parking standards be included within the Local Plan?
- Should the role of key routes and the motorway network within the Borough be made explicit?
- How can the Local Plan best provide for new forms of transport such as electric cars & its accompanying infrastructure?

## **Renewable Energy**

**15.41** A renewable energy source means energy that is sustainable - something that can't run out, or is endless, like the sun (solar power). It means sources of energy that are alternative to the most commonly used non-sustainable sources - like coal.

**15.42** Opportunities for renewable energy should be optimised but not by having a negative effect on communities or the landscape.

**15.43** Staffordshire Climate Change Strategic Development Framework/Action Plan sets out how the Council will achieve net zero emissions by 2050. The priority is to reduce the emissions of our services and estate and covers five priority themes:

- Organisation carbon reduction

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- Air quality
  - Natural environment
  - Waste
  - Behaviour change

**15.44** Staffordshire County Council, in conjunction with eight of the Local Authorities in Staffordshire also commissioned AECOM to produce the 'Climate Change Adaption and Mitigation Report 2020'. This report provides technical support to develop an evidence base for new energy and sustainability policies being considered for Staffordshire County Council and its eight constituent Local Authorities. The report also shows future emission trajectories should key interventions be facilitated. This document is a key source of evidence and promotes a number of potential policy options and strategies that could be taken forward through Local Plans.

**15.45** The NPPF states that planning should shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

**15.46** The NPPF also states that plans should help increase the use and supply of renewable and low carbon energy and heat, plans should:

- provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development
- Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

Figure 23 Horwood Energy Centre, Keele University Campus



### Question 34

What measures would you like to see in a Local Plan policy on renewable energy?

#### Thinking Points:

- Do you agree that the policy options set out in the AECOM Climate Change Adaption and Mitigation Report 2020 should be considered to include in the Local Plan?
- Given the Borough's Climate Emergency declaration and the aim for a zero carbon Britain by 2050, what other carbon reducing approaches could be appropriate to include in the Local Plan?

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- Should development over a certain size threshold (such as 10 dwellings) be expected to provide a certain proportion of its energy consumption via renewable or low carbon technologies?
  - Should the use of renewables be aligned with any improvements to a building's fabric, known as the fabric first approach?
  - How can the appearance of renewable technologies be best mitigated, particularly in more sensitive locations such as conservation areas?

### **Question 35**

**Are there any other topics that the Local Plan should address?**

### **Question 36**

**Are there any other matters you would like to make a comment on?**

### **Question 37**

**Do you have any files to upload?**

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## 16 Glossary

**Affordable Housing:** Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); Comprises of social rented, affordable rented and intermediate housing for households whose needs are not met by the market. Social rented housing is owned and rented out to households by local authorities, private registered providers or other approved landlords. Affordable rented housing is let under similar arrangements but at 20% below local market rents. Intermediate housing comprises of homes for sale and rent and can include shared equity (shared ownership and equity loans) and other low cost homes for sale and intermediate rent. A new (2021) initiative by the Government – First Homes - are designed to allow people to get on the housing ladder in their local area, and in particular to ensure that key workers providing essential services are able to buy homes in the areas where they work.

**Air Quality Management Areas:** Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

**Ancient Woodland:** An area that has been wooded continuously since at least 1600 AD.

**Ancillary:** A subsidiary or secondary use or operation closely associated with the main use of a building or piece of land. As a general rule, ancillary uses will require planning permission.

**Brownfield Land:** See ‘previously developed land’.

**Carbon Capture:** A way of collecting the carbon produced when fuel is burned, so that it is not released into the air.

**Climate Change:** Climate change is the long-term shift in average weather patterns across the world. Since the mid-1800s, humans have contributed to the release of carbon dioxide and other greenhouse gases into the air. This causes global temperatures to rise, resulting in long-term changes to the climate.

**Core Spatial Strategy:** The existing, overarching development plan document for Newcastle-under-Lyme and Stoke-on-Trent. It sets out the long-term spatial vision for areas, the spatial objectives and strategic policies and proposals to deliver that vision. The Core Spatial Strategy was adopted by both Councils' in 2009 and will be replaced by the Newcastle under Lyme Local Plan.

**Conservation Area:** Conservation areas are designated if any parts of area are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.

**Decentralised Energy:** Local renewable and local low-carbon energy sources.

**Development Management (decision-taking):** A function of the respective Councils' which considers and decides submitted planning applications against relevant planning policy and any other material considerations.

**Development Plan/Development Plan Documents (DPDs):** Planning strategies and policies to direct the future development of an area. They include Local Plans and Neighbourhood Plans (as defined in section 38 of the Planning and Compulsory Purchase Act 2004) and are prepared by the local planning authority or qualifying neighbourhood plan body in consultation with the community.

**District Heat Network (DHN):** A system for distributing heat generated in a centralized location through a system of insulated pipes for residential and commercial heating requirements.

**Draft Local Plan:** This stage of the plan production process follows on from this Issues consultation and the forthcoming Strategic Options stage. It is at this stage that the Council will present their preferred strategy and planning policy approaches to address the planning issues raised in this paper and any other issues that arise through the plan production process.



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**Duty to Cooperate:** This is a legal requirement introduced by the Localism Act 2011. It requires that public bodies should engage constructively, actively and on an ongoing basis on strategic planning issues that cross administrative boundaries.

**Ecological Network:** Sites and corridors of biodiversity importance that are linked together.

**Economic Development:** Development that generates jobs and economic growth. This can include industrial uses, warehousing, offices, retail and leisure.

**Employment Land Review:** This is an evidential study that identifies different levels of economic and employment growth over the plan period and the amount, type and location of land that is best suited to meeting the projected levels of growth.

**Enterprise Zone:** Areas designated by the government which have the backing of the local authority and Local Enterprise Partnership. Within these areas planning processes are streamlined, lower rates of tax are applied and there is greater investment in infrastructure (including superfast broadband) to better enable economic development to take place.

**Evidence Base:** Up-to-date and relevant studies, data, information and analysis on the economic, social and environmental characteristics and prospects of the area to inform and support the preparation of the Local Plan.

**Examination in Public:** Before it can be adopted, a Local Plan must be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with legal and procedural requirements, and whether it is considered 'sound'. To be 'sound' a document must be positively prepared, justified, effective and consistent with national policy.

**Functional Economic Market Area (FEMA):** The geographical extent of a distinct local commercial property market. There is no standard approach to defining the extent of this area but it is possible to identify it by taking account of a combination of information sources such as transport networks, travel to work areas, housing market areas, administrative areas, areas covered by Local Enterprise Partnerships and the flow of goods, services and information within the local economy.

**Green Belt:** Designated areas of countryside surrounding large urban areas. These are designated to prevent urban sprawl, safeguard the countryside from encroachment, prevent towns from merging together, and preserve the setting and character of historic towns and to assist regeneration within the urban areas. Green Belt boundaries can only be amended when the local plan for the area is reviewed.

**Green Infrastructure:** A network of multi-functional green space which is capable of delivering a wide range of environmental benefits and quality of life benefits for local communities. Green infrastructure can encompass both urban and rural areas. Green infrastructure includes parks and gardens, canals, cemeteries, allotments, plantations and green spaces.

**Greenfield Land:** Land that has not previously been developed (see entry for 'previously developed land'). This includes land currently or last used for agriculture and forestry and private garden land.

**Heritage Asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets such as Scheduled Ancient Monuments, Listed Buildings, Registered Park and Gardens, Registered Battlefields or Conservation Areas as well as assets identified by the local planning authority (including local listing).

**Historic Environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

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**Housing Market Area:** This is the area within which the local housing market operates. The extent of the Housing Market Area is defined within the Strategic Housing Market Assessment (see separate entry below).

**Intermediate Housing:** A type of affordable housing (see 'affordable housing').

**Key Village:** These settlements contain some, but not all of the essential services and facilities to meet the day to day needs of residents and therefore have a more limited offer Rural Centre.

**Local Industrial Strategy:** A strategy for investment produced by the Local Enterprise Partnership that focuses on opportunities for boosting productivity, economic renewal and growth.

**Local Enterprise Partnership (LEP):** A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area. The body that covers Newcastle-under-Lyme is the Stoke-on-Trent and Staffordshire Local Enterprise Partnership.

**Local Nature Partnership (LNP):** A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

**Local Plan:** The Local Plan is being prepared by the Borough Council to guide future development across the local authority area. The final, adopted version of this development plan document will detail the strategy for development across the area up to 2037 and will contain detailed policies which Newcastle-under-Lyme Borough Council will use to manage future development.

**Local Planning Authority:** The public authority whose duty it is to carry out specific planning functions for a particular area, such as creating planning policies or deciding planning applications. Newcastle-under-Lyme Borough Council is the local planning authority for Newcastle-under-Lyme.

**Main Town Centre Use:** Retail development, leisure, entertainment facilities, offices, arts, culture and tourism development. Examples include shops, cinemas, restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, bingo halls, theatres, museums, galleries, hotels and conference facilities.

**Mineral Safeguarding Area:** An area covering known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. In the Local Plan area Staffordshire County Council are responsible for designating Mineral Safeguarding areas.

**Monitoring:** Involves the collection and analysis of data and statistics to understand how patterns of development are changing. An example of this is the collection of housebuilding statistics. Monitoring data can show how effective planning policies are in influencing development. Such information is reported by local planning authorities in their Authority Monitoring Report (AMR).

**National Planning Policy Framework (NPPF):** The Government's planning policies for England, which provide a policy framework that sets the parameters under which Local Plans and Neighbourhood Plans should be prepared, and decisions on planning applications should be made.

**National Planning Practice Guidance (NPPG/PPG):** The Government's more detailed online guidance on national planning policies, which adds further detail to the NPPF.

**Neighbourhood Plans:** Development plan documents which can be prepared by local communities, such as neighbourhood forums, business forums or parish and town councils. Neighbourhood Plans must conform to the strategic development priorities of the Local Plan but can shape and direct local development within their neighbourhood area.

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**Objectively Assessed Housing Need (OAN):** Also called a ‘full, objective assessment of housing needs’ (FOAN), this is an assessment undertaken within the Strategic Housing Market Assessment (see separate entry below) which identifies the extent of the need for new housing, without being influenced by planning matters such as the ability of the land supply to accommodate the levels of development – these matters are considered within the Local Plan preparation process.

**Open Space:** Space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

**Out of Centre:** A location which is neither within nor on the edge of a town centre.

**Parish and Town Councils:** Elected local authority bodies responsible for civil parishes. Parish and town councils have the ability to be designated as bodies to produce Neighbourhood Plans for their local areas.

**People with Disabilities:** People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

**Pitch:** a pitch may encompass the following elements,

- A parking area for a towing vehicle (small lorry, van or large car)
- A towing caravan for travelling
- A static caravan which forms the base for the home
- A wash building for personal and household cleaning

A pitch therefore can include two caravans and allowing for manoeuvring space is approximately four times the size of a static caravan.

**Planning Policy (plan-making):** A function of local planning authorities that prepares planning policies and development plan documents to direct decisions on development proposals within the authority’s area.

**Pollution:** Anything that affects the quality of land, air, water or soils and which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

**Previously Developed Land:** Land which is or was occupied by a permanent structure. This excludes land occupied by agricultural or forestry buildings, restored land previously used for minerals extraction or landfill and private residential gardens.

**Primary Shopping Area:** Area in a town or city centre that is defined within planning policy documents where retail development is concentrated as the dominant use in that location.

**RAMSAR Site:** Wetlands of international importance, designated under the 1971 Ramsar Convention.

**Regional Spatial Strategy (RSS):** Previously a development plan document prepared at the regional level to direct the development strategy that local authority development plans were to conform with. Regional Spatial Strategies were revoked by the Localism Act 2011 and no longer apply.

**RENEW North Staffordshire:** This was an organisation that was set up to coordinate the renewal of the housing market in North Staffordshire as part of the previous government’s Housing Market Renewal Pathfinder programme. This programme ended in 2011.

**Renewable and Low Carbon Energy:** Includes energy for heating and cooling as well as generating electricity. ‘Renewable’ covers sources of energy that occur naturally and repeatedly, for example wind, water, sun and also biomass and geothermal heat from below the ground. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

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**Retail Impact Threshold:** The National Planning Policy Framework sets out that under the retail impact assessment test, local authorities should require an impact assessment if a proposed development is over a locally set floorspace threshold. If an application for out of town development fails to satisfy the test it should be refused.

**Rural:** Rural areas are those areas that are not urban, i.e. consisting of settlements below 10,000 people or are open countryside. The Rural Area is defined on the Policies Map.

**Rural Centres:** These settlements provide a significant role in service provision to the local population and must contain a number of essential services and facilities in order to meet the day to day needs of residents.

**Saved Policies:** Older local plan policies that can remain in place following a direction given by the Secretary of State under the Planning and Compulsory Purchase Act 2004. A list of currently saved policies in Newcastle-under-Lyme is available on the authority's website.

**Site Allocation:** A site designated within a development plan document for a specific type of use. For example, housing, employment or retail development.

**Site of Special Scientific Interest (SSSI):** Sites designated by Natural England under the Wildlife and Countryside Act 1981.

**Social Housing, or Social Rented Housing:** A type of affordable housing (see 'affordable housing')

**Statement of Community Involvement (SCI):** A document adopted by a local planning authority which describes how the public, business and interest groups within a local authority area can get involved in plan-making and the decision-taking.

**Strategic Economic Plan (SEP):** This is a document produced by the Local Enterprise Partnership (LEP – see separate entry above) which sets out the vision, aims and objectives for economic growth within the LEP area.

**Strategic Housing Land Availability Assessment (SHLAA):** This is an assessment of sites across a local planning authority area that may be capable of accommodating housing development. It is an assessment of all known sites in the area but it does not constitute a council's view on which sites should or should not be developed for housing. The assessment is intended to identify whether or not sites are suitable, available and achievable for housing development.

**Strategic Housing Market Assessment (SHMA):** This is an evidential study that examines the extent and the operation of the local housing market. It also identifies the extent of the housing needs that exist or are likely to arise within the defined housing market area.

**Strategic Options:** This is the next stage in preparing the Local Plan. At this stage the different ways that the issues identified within this paper can be addressed will be explored. For example this could include identifying how much development could be accommodated in different areas within both authorities. No particular solution will be fixed at this stage as this will be done within the draft local plan. Further issues to consider may however be identified at the Strategic Options stage.

**Submission:** This is when the final version of the Local Plan will be sent to the Secretary of State to be subject to an independent Examination in Public. There will be a final round of public consultation prior to submission and any resulting comments received will be considered by the appointed Planning Inspector who will oversee the Examination.

**Supplementary Planning Documents (SPDs):** Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

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**Sustainability Appraisal:** An assessment of the impacts of policies and proposals on economic, social and environmental objectives, i.e. 'sustainable development'.

**Sustainable Development:** Development which contributes to meeting the long term economic and social needs of the community, whilst balancing this against the need to avoid creating an unacceptable long term impact on the environment.

**Sustainable Transport:** Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

**Town centre:** Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

**Unitary Authority:** A local government authority with responsibility for all local government functions in that area.

**Viability:** Refers to the financial implications of development. If the costs of development do not allow for a sufficient financial return to the developer then the development will not be viable. Viability can be affected by the costs of developing the land, the costs of providing wider benefits such as open space or affordable housing, and the sale value of the completed development.

**Windfall Site:** A site not specifically identified for development in a plan, but which becomes available for development or is granted planning permission during the lifetime of the plan.