

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

1. Introduction

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

2. Purpose and List of Parties Involved

- 2.1 The parties involved include Newcastle-under-Lyme Borough Council and Historic England
- 2.2 This is a statement of common ground between the parties. The statement provides a record of discussions between the parties and how far this has gone towards resolving issues. Meetings will continue on an ongoing basis and the statement of common ground may be updated accordingly.

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

- 3.1 The approach to the Statement of Common Ground is to follow the structure of the representations made by Historic England at Regulation 19 stage.
- 3.2 In their representation made on the Final Draft Local Plan (at Regulation 19 stage), Historic England have expressed a number of comments / concerns in relation to the NUL Local Plan, the following items set out the current position in relation to those elements and where agreement has been achieved.

Heritage Impact Assessment (HIA)

- 3.3 Historic England welcome the preparation of a Heritage Impact Assessment to evidence inclusion of site allocations within the Plan. Historic England welcome the inclusion of a specific policy in the Final Draft Local Plan on the historic environment. A number of suggested modifications to the Local Plan have been suggested and these are considered in table 1, below.

Keele Hall Registered Park and Garden, Keele Hall Conservation Area and associated Heritage Assets.

- 3.4 Historic England have welcomed the Heritage Impact Assessment published in support of the Local Plan and its site allocations. In the majority of cases the appropriate mitigation measures are within the HIA; in some cases, these have been brought through to the Plan and in others some additional detail is required to ensure that these issues are considered at planning application stage.

Areas of Ongoing Discussion

Historic England

- 3.5 Historic England remain concerned about the harm to heritage assets, particularly at Keele Hall Registered Park and Garden, Keele Hall Conservation Area and associated heritage assets, as well as the cumulative impact to these assets through multiple site allocations within a local vicinity.

Newcastle-under-Lyme Borough Council

- 3.6 The Council has utilised the Heritage Impact Assessment outcomes in relevant policies to ensure that appropriate consideration is taken to the historic assets at Keele and that impacts are minimised and / or mitigated, as appropriate.

Other Matters

- 3.7 Historic England have requested amendments / additions to some of the wording in the Local Plan. The following table shows the response to the comments made by Historic England. The table below acknowledges when a matter raised is considered of strategic significance: -

Table 1: Historic England and NUL - outcomes of policy engagement

Policy / Page	HE recommendation	NUL Comment / Proposed Amendment
General	Policies should be differentiated from supporting text in some way.	Noted, in the final presentation of the Local Plan, policy boxes can be added to ensure that there is

		differentiation between the policy / supporting text to improve the legibility of the Local Plan to aid decision takers.
Paragraphs 4.2 & 4.16	Welcome reference to Historic Environment in Vision and Strategic Objectives	Noted
Policy PSD1 Overall Development Strategy, Clause 4, pg 13	Ensure that Historic Environment is appropriately referenced.	The Local Plan is intended to be read as a whole and as such windfall development proposals would be considered against the historic environment policy SE9, as appropriate
Policy PSD2 Settlement Hierarchy, pg 15	The policy should clearly reference the need to protect the significance of heritage assets and their setting within all four clauses, as the issues are equally relevant within all the locations.	The purpose of the settlement hierarchy is to provide a grouping and hierarchy of settlements in the Borough. The Local Plan is intended to be read as a whole and, as such, development proposals would be considered against the historic environment policy, as relevant
Policy PSD4, Development Boundaries and Open Countryside, pg 18&19	Clause 4 would benefit from reference to historic environment	Noted, the clause is intended to be amended as follows:- "4. Development proposals should not harm the character, appearance, historic and environmental quality of the Countryside....."

Policy PSD7, Design pg 24	Reference to historic environment should be added to the policy	Noted, a new clause is intended to added as follows:- <u>12. Development proposals should respond positively to local character and should conserve and, where possible, enhance heritage assets and their settings</u>
Policy CRE1, Climate Change pg 26	Reference to the historic environment should be added	Criterion 11 of Policy CRE1 considers the historic environment in respect of climate change considerations
Policy CRE2 Renewable Energy pg 28	Clause 3, support for reference to the historic environment, recommend that the word 'impact' is changed to harm. In clause 8, reference should be added to the need to protect heritage assets and their settings.	Noted. Clause 3 is proposed to be amended to substitute the word impact for harm. Clause 8, a new sub-clause added to the policy, as follows: - <u>8e. Proposals protect the significance of heritage assets and their settings.</u>
Policy EMP3, Tourism 50 Clause 2 Para 8.13	Support the reference to historic environment in this policy. Amend historic assets with heritage assets	Noted Noted and agreed. The word historic is proposed to be replace with heritage
Policy RET2, Shop Fronts, Advertisements, New Signage pg 54, Clause 2	The wording should refer to heritage assets (designated and non designated) including Conservation Areas and their settings.	Noted and agreed. Proposed to amend the policy wording, as follows:- <u>"In schemes impacting on heritage assets (designated and non designated) including Conservation Areas and their settings Conservation Areas and /or near Listed Buildings....."</u>
Policy RET4, Newcastle-under-Lyme Town Centre, pg 56 Clause 3	Support inclusion of this clause	Noted
Policy RET5, Kidsgrove Town Centre pg 57	Policy would benefit from the inclusion of the same clause as in policy RET4 (clause 3)	Noted and agreed. Additional clause proposed for Policy RET, clause 2, which states: - <u>2) Development should conserve and enhance heritage assets in the town centre</u>
Policy IN1, Infrastructure pg 58,	Support the inclusion of clause 5.	Noted

Clauses 5 & 13	Does the Council have any evidence to highlight assets of potential harm for heritage assets from the contents of Clause 13?	Both transport schemes would be subject to their own discrete approval processes. That being said, the link road referenced falls in the Keele (KL13/15) and TB19 sites which have been considered through the Heritage Impact Assessment.
Policy IN2 Transport and Accessibility, pg 60	The policy should include a clause on the historic environment and the need to protect significance of heritage assets.	The policy details the importance of sustainable travel and access issues predominantly. As the Plan is intended to be read as a whole, it is not considered appropriate to include a reference to the historic environment in the Policy at this time.
Policy IN6 Telecommunications Development, pg 67 Clause 1 e	Amend to "would not harm the significance of a heritage asset, including its setting".	Noted and agreed, text as proposed to be added to the clause.
Policy IN7 Utilities, pg 67, Clause 4	A clause setting out that no harm to the significance of heritage assets and their setting would be useful here.	Noted and agreed, text proposed as follows:- "Within sensitive areas such as <u>near Conservation Areas heritage assets and their settings, new utility services should not harm the significance of the heritage asset</u> . New utility services should be laid...."
Paragraph 11.19	This paragraph references heritage and this is supported.	Noted
SE9 Historic Environment, pg 86	Clause 1, a) considers a wide range of issues and may be more readable if the issues are broken down into bullet points, so that it is clear how each of the issues need to be considered. Links to the specific urban and townscape heritage characterisation studies would be useful.	On the readability of clause 1, the Council considers that the wording of clause 1 is appropriate in framing the issues raised. The policy states that proposals should take account of the visual impact of the character of settlements which the Council considers is sufficient. Links to urban townscape and heritage characterisation studies which may

	<p>e) we support the reference to Conservation Area Appraisals and Management Plans. A link to these would also be beneficial.</p>	<p>change over the Plan period can be accessed on the Borough website.</p> <p>Support for reference to Conservation Area Appraisals is noted.</p>
SE9 Historic Environment, pg 86	<p>Clause 2. In the first instance the policy should set out that where a proposal will cause harm to a heritage asset, this should be resisted. The National Planning Policy Framework (NPPF) is clear that heritage assets are an 'irreplaceable resource' and any harm should be 'wholly/exceptional' (NPPF paragraphs 195/206). The policy should set out a hierarchical approach on how harm will be resisted, and all opportunities sought to avoid and mitigate harm, enhancement measures sought and only after all other issues have been exhausted would the issues of public benefit tests and clear and convincing justification apply.</p> <p>Consider the hierarchy within this policy between clause a and b. If clause a is to be resisted, then it stands that clause b should also be resisted.</p> <p>c) Less than substantial harm may still amount to considerable harm and reason for planning applications to be refused. It may be that the public benefit tests apply but in the first instance development which causes less than substantial harm should be resisted and more suitable locations sought.</p> <p>g) we support the inclusion of the two bullet points in this clause and consider both are essential.</p>	<p>This clause is proposed to be amended as follows:-</p> <p><u>2. Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.</u> Proposals that will lead to harm to or loss of the significance of a heritage assets (from its alteration or destruction, or from development within its setting) will be resisted require clear and convincing justification. Where proposals will lead to:</p> <ul style="list-style-type: none"> a) Any direct or indirect <u>impact harm</u> on the significance.... b) Any direct or indirect impact on the significance of other forms of non-designated heritage asset <u>will be resisted</u>: a balanced judgement.... <p>Add the following text to paragraph 11.49 <u>The Council is committed to the protection and conservation of the Borough's heritage assets. In determining planning applications that may affect heritage assets, the Council will apply a hierarchical approach. In the first instance, proposals that will cause harm to a heritage asset, or its setting, will be resisted.</u></p>

	<p>No demolition should occur before it has been confirmed that the development will go ahead.</p>	<p>Add the following text to paragraph 11.51</p> <p><u>In line with the NPPF, any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. The starting point for considering proposals that may affect heritage assets should be to avoid harm altogether. Where harm cannot be avoided, proposals should clearly demonstrate that all reasonable efforts have been made to minimise and mitigate the harm through for example appropriate design, layout, and materials. Where less than substantial harm is identified, this will be weighed against the public benefits of the proposal. It should be noted that even ‘less than substantial harm’ can still amount to considerable harm and can still be a reason for refusal should the harm be considered to outweigh the benefits of a proposal. When assessing less than substantial harm, a balanced judgement will be made having regard to the scale of any harm or loss and to the significance of the heritage asset. In the first instance, development should be located in areas that avoid harm to heritage assets. Where this is not possible, options should be explored to minimise harm. Only when all other options have been exhausted should the public benefits of a proposal be considered, and these benefits must clearly and convincingly outweigh any identified harm</u></p> <p>Add the following text to paragraph 11.53</p> <p><u>The policy differentiates between historic farmstead buildings (Clause 2(a)) and other forms of</u></p>
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		<p><u>non-designated heritage assets (Clause 2(b)). This reflects the unique contribution that historic farmsteads make to the Borough's rural character and landscape. The Council seeks to resist harm to all heritage assets, in line with the NPPF. However, the policy highlights historic farmsteads due to their particular importance to the character of the Borough. Clause 2(a) therefore seeks to resist the demolition of buildings associated with historic farmsteads. Clause 2(b) provides a framework for assessing proposals affecting a wider range of non-designated heritage assets, requiring a balanced judgement based on the asset's significance, proposed mitigation, and the scale of any harm or loss.</u></p>
SE9 Historic Environment, pg 86	<p>Clause 3</p> <p>Clause 3, b) Proposals should include in their HA where harm may occur so that the Local Authority can make an informed decision. The HA should further include avoidance/mitigation measures where they are possible. Where harm cannot be avoided then applications should be refused, except in exceptional circumstances in line with the NPPF.</p>	<p><u>3 (d) amend text to read</u></p> <p><u>Demonstrate that all opportunities to avoid harm to the significance of the heritage asset have been explored, then set out mitigation measures to minimise any harm, and, where necessary, justify any identified residual harm to the significance of the heritage asset/s; and</u></p> <p><u>Add the following text to paragraph</u></p> <p><u>11.54. Heritage Impact Assessments (HIAs) should be prepared in accordance with relevant guidance, including Historic England's guidance on 'Statements of Heritage Significance' and 'The Setting of Heritage Assets'. HIAs should demonstrate a thorough understanding of the significance of the affected heritage assets, including any contribution made</u></p>

		<p><u>by their setting. They should clearly identify any potential harm to heritage assets or their settings, following a hierarchical approach that prioritises the avoidance of harm in the first instance. Where harm cannot be avoided, the HIA should outline appropriate mitigation measures. Only where harm is unavoidable and mitigation measures have been exhausted should the assessment set out the public benefits of the proposal which are considered to outweigh any residual harm, providing clear and convincing justification in line with the tests set out in the NPPF. Assessments should also identify opportunities for enhancing the significance of heritage assets, as set out in Policy SE9</u></p>
SE9 Historic Environment, pg 86	<p>Clause 4, b) Consider removing from the Plan. Enabling development is development that is contrary to policy and as such does not sit comfortably within a policy. It is beneficial to have a section on heritage at risk and the Plan to provide a positive strategy for these assets. However, an enabling development strategy may not be the best approach and all viable options should be considered in the first instance to ensure harm will not occur to these heritage assets.</p>	<p>Remove clause 4(b) from the Plan</p>
SE9 Historic Environment, Pg 88	<p>No policy clause included within the Plan to assess archaeological features</p>	<p>Add a new criterion 6, as follows:- <u>6. When considering proposals that may affect heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation, may be required. This assessment should be carried out by a suitably qualified professional in accordance with relevant guidance.</u></p>

		<p>Add a new paragraph 11.54a, as follows:-</p> <p><u>The historic environment encompasses a wide range of heritage assets, including buildings, monuments, sites, places, areas, or landscapes, and including any archaeological remains. When considering proposals that may affect heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation, will be required. This assessment should be carried out by a suitably qualified professional in accordance with relevant guidance. The Council will expect any such assessments to demonstrate an understanding of the potential impact of the proposed development on the archaeological significance of the asset, and to set out appropriate mitigation measures to avoid or minimise any harm. It should be noted that all archaeological remains are a finite and irreplaceable resource, and any harm to them should be avoided wherever possible. Where necessary, the Council will use planning conditions or obligations to secure appropriate archaeological investigation, recording, and mitigation measures</u></p> <p>Add a new paragraph 11.54b, as follows:-</p> <p><u>The details of an appropriate desk-based assessment and, where necessary, a field evaluation will be determined on a site-by-site basis, in consultation with the relevant local authority archaeological</u></p>
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		<u>advisor to ensure the proposed scope of works are appropriate and proportionate to the specific circumstances of the site. The Council will use planning conditions or obligations to secure appropriate archaeological investigation, recording, and mitigation measures where necessary.</u>
SE14 Green and Blue Infrastructure, Pg 96	This policy should have a clause within it relating to heritage assets and the need to protect their significance, including setting.	The Council's position is that the Local Plan is intended to be read as a whole and, as such, development proposals would be considered against the historic environment policy, as relevant The position of Historic England is that a clause is still recommended to recognise heritage as a component of Green Infrastructure.
Policy RUR1 Rural Economy, pg 98, Clause 2 (e)	Insert 'appropriate' at the beginning to the sentence to ensure that it is appropriate reuse only that is considered.	The policy is clear that the re-use of the building should conserve and where possible enhance the significance of the farm building and be in accordance with policy SE9.
Policy RUR3 'Extensions and Alternations to Buildings Outside of Settlement Boundaries, pg100, Clause 1(e)	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.	Noted, amend criterion RUR3, clause 1e, as follows:- e. <u>Protect</u> Sustain and enhance the significance of any affected heritage assets {and their settings} in accordance with Policy SE9 (Historic Environment)
Policy RUR4 Replacement Buildings Outside of Settlement Boundaries, pg 101, Clause 1(G) and 2 (I)	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'	Noted, amendments are proposed to clauses 1(G) and 2 (I), as follows:- The proposals sustain protect and enhance the significance of any affected heritage assets <u>including</u> (and their settings) in accordance with Policy SE9 (Historic Environment)
Policy RUR5 Re-use of Rural Buildings for Residential Use, pg 103, Clause 1(f)	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'	Noted, amendments are proposed to clause 1(f) as follows:- The proposals sustain protect and enhance the significance of any affected heritage assets, including buildings formerly associated with a

		historic farmstead (and including their settings) in accordance with Policy SE10 <u>SE9</u> : Historic Environment
Table 6, masterplans and historic environment	Support the historic environment section and note the importance of engaging with Historic England, as appropriate.	Noted
Policy AB2 Land at Junction 16 of the M6, pg111	<p>Clause 11, what specific mitigation measures in the Council's own HIA can be utilised here to ensure that harm to heritage assets will not occur.</p> <p>Clause 12, the development should ensure the retention of heritage assets on site. Additionally, based on the HIA findings an archaeological assessment will be required as the potential for archaeological remains is high. Separate the clause relating to retention of assets and need for archaeological assessment.</p>	<p>The policy requires the site promotor to provide a Heritage Impact Assessment informed by the considerations of the assessment produced by the Council.</p> <p>Criteria 12 requires the retention of heritage assets within the footprint of the site. Consistent with the Heritage Impact Assessment, it acknowledges that a programme of archaeological evaluation is required.</p>
KL13 Keele Science Park, Phase 3, Clauses 6, 8 and paragraph 13.77	<p>Remain concerned about the heritage assets listed including Keele Hall Registered Park and Garden, and associated heritage assets and Keele Hall Conservation Area. The HIA is very limited in detail with regards to the impacts for Keele Hall RPG and the impact of the development on this asset.</p> <p>Consider the wording used to identify this mitigation measure. It should be clear that a landscape buffer is required and why and this should form part of any masterplanning/ planning application submission. The HIA identifies other mitigation measures that should be brought into the Local Plan to ensure that harm is minimised, if this development goes ahead.</p>	<p>The wording in the policy, as proposed, recognises that part of the science park has been delivered and the policy supports the delivery of the remaining elements of the site.</p> <p>The Council's Heritage Impact Assessment notes that the development of the site would further add to an already semi-developed area. The policy wording is considered to be consistent with the requirements of the Council's Heritage Impact Assessment.</p>

	Additional detail will be required to ensure that development is able to avoid/mitigate harm to heritage assets.	
KL15 Land South of A525 Keele, pg 125 Clauses 7 and 8	<p>We remain concerned about the heritage assets listed including Keele Hall Registered Park and Garden, and associated heritage assets and Keele Hall Conservation Area. The HIA is very limited in detail with regards to the impacts for Keele Hall RPG and other heritage assets and the impact of the development on these assets. The avoidance, mitigation and enhancement measures identified in the Council's own heritage impact assessment need to be fully considered and included within the clause.</p> <p>Support the need for archaeological assessment. Additional detail from the HIA should be included within the clause.</p>	Support for the archaeological assessment is noted. The policy requires a Heritage Impact Assessment to be produced, informed by the considerations of the assessment completed by the Council. It is considered that criteria 7,8 and 11 reflect the outcomes of the Heritage Impact Assessment.
LW53 Land at Corner of Mucklestone Wood Lane, pg133 Clauses 3, 4 and 5	Draw through the specific mitigation measures from the HIA	Criterion 3 of the policy requires the submission of a Heritage Impact Assessment to be produced, informed by the considerations of the assessment completed by the Council. As such, development proposals should have appropriate regard to the mitigation measures set out in the Heritage Impact Assessment. Criterion 5 requires a landscape buffer along the eastern edge of the site in relation to the White House Farm Grade II Listed Building.
MD29 Land North of Bar Hill, pg 135, Clause 11	<p>No impact assessment included within the HIA relating to the heritage assets at Madeley Conservation Area.</p> <p>Insert a clause within this policy regarding the need for appropriate archaeological assessment</p>	<p>The Heritage Impact Assessment has considered heritage assets within an identified buffer of the site. Madeley Conservation Area is referenced in the assessment of the site, included in the Heritage Impact Assessment.</p> <p>A new clause is proposed to be inserted to require an appropriate</p>

		<p>archaeological assessment on the site.</p> <p>Separately to the Local Plan, the Council's planning committee approved a planning application for 155 dwellings, subject to a section 106 agreement (ref 23/00979/OUT).</p>
SP11 Lyme Park, pg 138 Clause 3	Concerns over impact on nearby heritage assets and the Keele Hall Registered Park and Garden.	<p>Clause 3 requires the site promoters to prepare a heritage impact assessment on the site, with appropriate reference to the work undertaken by the Council. There are a number of other mitigation measures which reflect the recommendations of the Council's Heritage Impact Assessment including criterion 14 and the provision of a landscape buffer and criterion 4 in relation to a programme of archaeological recording on the site</p>
SP22 Former Playground off Ash Grove, pg 142 Clauses 4,5 and 6	<p>Concerned about the impact to Silverdale Conservation Area and St Luke's Church Grade II. As well as the impact to the significance of Keele Hall Registered Park and Garden. There is no detail within the impact section of the HIA on how these assets will be affected. Additionally, there is a reference to less than substantial harm from a cumulative impact, but this has not been addressed as to how this harm could be overcome. Clause 5 is welcomed. No reference to Keele Hall RPG or cumulative effects. Clause 6 is welcomed.</p>	<p>The Council's Heritage Impact Assessment has considered impacts on the Conservation Area and includes mitigation in criteria 4,5 and 8. The assessment notes that the edge of the registered Park & Garden of Keele Hall lies just within the study area, nearly 1km to the south, but there is no intervisibility between this and the site.</p>
SP23 Land at Cemetery Road, pg 142	There is no reference within the HIA regarding the potential impact to the designated heritage assets within the study area, many of which are likely to be affected by other proposed allocations including the heritage assets at Keele Hall RPG, Keele	<p>The Heritage Impact Assessment prepared for the site identifies a low heritage sensitivity score for the proposal. The site includes a number of listed mitigations including the retention of trees and hedgerows and a landscape buffer in recognition of mitigation</p>

	Hall Conservation Area and associated heritage assets	measures identified through the heritage impact assessment
TK6, Site at Coalpit Hill, pg 148	Clause 3 is generic in nature	The Council maintains that this clause, which requires consideration of heritage assets and their setting in accordance with Policy SE9 (Historic Environment), provides a sufficiently robust framework for assessing potential harm to heritage assets. Specific mitigation measures, where necessary, will be considered during the detailed design stage of any development proposal for the site and will be subject to further scrutiny as part of the application process
TK10, Land at Crown Bank, pg 148 Clauses 6,7 and paragraph 13.222	Additional detail required on mitigation measures required.	The Policy as drafted, is considered to be consistent with the mitigation measures identified in the Heritage Impact Assessment. Indeed the policy requires a site specific Heritage Impact Assessment that considers how the site responds sensitively to the Talke Conservation Area and associated heritage assets.
TK17 Land off St Martins Road, pg 150, Clauses 4 and 5	Additional detail is required to be included in the Plan to overcome potential harm identified and to consider the cumulative impact to identified heritage assets and how this may be overcome. Add additional detail about the type of archaeological assessment required.	It is considered that the existing policy wording is consistent with the mitigation measures identified in the Heritage Impact Assessment, prepared by the Council. The site policy requires a site specific heritage impact assessment also.
TK27 Land off Coppice Road, pg 151 clause 4	We welcome the additional detail included within clause 4	Noted
TB19 Land South of Newcastle Golf Club, pg 153	<p>We have concerns over the cumulative impact for identified heritage assets set out in the HIA. How has this been assessed and how can this harm be overcome?</p> <p>The three relevant clauses within the policy set out the relevant issues, except the potential harm to Keele Hall RPG, Keele Hall Conservation Area and associated heritage assets and</p>	The allocation wording is considered to be consistent with the mitigation measures identified through the Heritage Impact Assessment.

	the broader cumulative impact for these sites and any mitigation measures that can overcome this harm.	
TC7 Ryecroft, pg 157	Clause 5 and Clause 6 do include some details but we need to be sure that any potential harm to these heritage assets can be overcome and suggest additional detail is included.	It is noted that there is concern on the impact of heritage assets. It is considered that the allocation wording is consistent with the Council's Heritage Impact Assessment. Separate to the Local Plan, development is taking place on parts of the Ryecroft site, including the development of a new multistorey car park.
NUL Town sites, TC20, TC22, TC45, TC50, TC52, TC71	Cumulative impacts should be identified. The policies should refer to heritage assets impacted by the sites.	The Council acknowledges Historic England's recommendation regarding the consideration of cumulative impacts for allocated sites. The Council confirms that the potential for cumulative impacts from the proposed development, in conjunction with other developments in the area, has been assessed as part of the Heritage Impact Assessment (HIA), including its setting. This assessment considered potential impacts on nearby heritage assets and the wider historic environment. The Council is confident that the proposed mitigation measures are sufficient to address any potential cumulative impacts. Any development will also have regard for Policy SE9: Historic Environment.


4. Duty-to-Co-operate Agreement

- 4.1 The parties agree that constructive and active engagement has taken place on strategic matters to date and will continue to do. The parties recognise that there are outstanding issues and that both will continue to work closely and where relevant with other prescribed bodies on strategic issues.

5. Signatories and Governance Arrangements

5.1 In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the parties on the issues referred to in this SoCG in the form of officer level meetings with escalation to more senior levels where necessary.
- that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of forming the local plan.

Newcastle-under-Lyme Borough Council
Name: Allan Clarke
Position: Planning Policy Manager
Date Agreed:
Signature: 

Historic England
Name: Tim Allen
Position: Team Leader (DA)
Date Agreed: 29/04/25
Signature: 