



Examination into the Soundness of Newcastle-under-Lyme's Local Plan.

Matter 2- Spatial Strategy

Matter Statement by Newcastle-under-
Lyme Borough Council

May 2025

1. Introduction

This statement sets out the Council's response to the Inspector's Matters regarding the Vision & Objectives, the Spatial Strategy, and the Site Selection Process.

All documents referenced in this statement are listed in Appendix 1.

Issue 2 – Are the provisions of the Plan in relation to the Spatial Strategy justified and consistent with national policy?

Qu 2.1 Is the proposed spatial strategy and the distribution of development (as set out in policies PSD2 and PSD3) supported by robust and up to date evidence and otherwise soundly based? In particular:

a) Does it reflect the vision and objectives of the Plan?

2.1.1 The proposed spatial strategy is consistent with the vision in focusing development on the larger centres in the Borough and providing opportunities for new homes and jobs to meet local needs and provide opportunities for people to enjoy good quality of life. The strategy provides for allocations to support businesses, the town centres of Newcastle-under-Lyme and Kidsgrove, alongside supporting the future intentions of Keele University, particularly as regards the Science Park. The development strategy and allocations within it supports the vitality of towns and villages and recognises and seeks to respect the character of those areas in a balanced way.

2.1.2 The spatial strategy and distribution of development reflects the objectives of the Local Plan: -

- The Local Plan, through policy and allocations, seeks to support the vitality of towns and villages in the Borough. Whilst recognising and supporting the place and character of those individual areas (SO-1).
- The Local Plan, as a whole, supports the diversification of the Borough's employment base and the delivery of employment sites which will benefit economic growth including in sectors supported by the strategic sites at Junction 16 ("AB2") and at Keele University ("KL13 KL15") (SO-2).
- The Local Plan supports investment in and regeneration of the market towns of Newcastle-under-Lyme and Kidsgrove through policies RET4 and RET5 alongside a number of town centre allocations which support town centre living and utilise existing brownfield sites (SO-3).
- The Local Plan includes policies that seek to reduce the Borough's carbon footprint and mitigate for the impacts of climate change, including those within section 6 of the Local Plan [CD01, pgs 25-28] (SO-4).
- The Local Plan provides for a mix of housing types and options in towns and rural centres. The development strategy is considered to support the vitality of rural villages to improve affordability for local people (SO-5 and SO-6).
- The Local Plan, through policy, seeks to support sustainable travel across the Borough (SO-7).

- The Local Plan, through policy, supports the provision of open spaces to support physical activity, including sport and recreation (SO-9).
- The Local Plan supports balanced growth at Keele University (SO-10).
- The Local Plan provides for targeted development proposals which are aimed at achieving a suitable balance between growth and conservation (SO-11 & SO-13).
- The Local Plan sets out a strategic approach to Green Belt boundary changes in the Borough whilst seeking to minimise Green Belt changes, in line with national planning policy (SO-12).

b) To what degree is the distribution of development set out in Policy PSD3 based on the settlement hierarchy in Policy PSD2? And c) Is the focus on the larger urban settlements justified and soundly based?

- 2.1.3 The settlement hierarchy was one element which informed the distribution of development in Policy PSD3. The hierarchy was informed by evidence in the Rural Area Topic Paper [ED005] to identify the rural centres included in the Plan at Policy PSD2(3). The hierarchy has been used in the Plan to help make judgements about the distribution of development, to ensure that growth is primarily directed to the strategic centre of Newcastle-under-Lyme and the urban centre of Kidsgrove, where there is good access to the widest range of services, facilities, employment opportunities and public transport. It also ensures that a proportionate level of development is directed towards rural centres to ensure their ongoing vitality and viability.
- 2.1.4 The Housing Spatial Strategy Topic Paper (“Housing Topic Paper”) explains that a number of factors, in addition to the settlement hierarchy, informed the broad locations for growth. These included the availability of site options including the presence of brownfield or underutilised land, the impact of Green Belt and ensuring that sustainable patterns of development are achieved, alongside broad spatial options presented at various stages of Plan making [ED031, 5.38 – 5.107]. The approach to spatial options was also informed by the outcomes of the Sustainability Appraisal, which set out the reasons for selection and rejection of growth distribution options [CD03, Appendix D Section 4, Table D.4.3 pgs D26-D27].
- 2.1.5 Newcastle-under-Lyme is the Strategic Centre of the borough. It has by far the largest population of any settlement in the borough and contains the greatest range of services and facilities, retail, sport and leisure, economic and residential areas, sustainable transport connections and accessible public open space. It represents the most sustainable location for growth and therefore is the primary focus for housing development in the Borough [ED031, 5.55, pg 40].
- 2.1.6 Kidsgrove is classed as an Urban Centre, smaller in population size than Newcastle but much larger than any rural centre. The centre performs a secondary, but complementary role to Newcastle-under-Lyme in terms of providing a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. Kidsgrove and its surrounds is a key location for growth in the Local Plan of a scale appropriate to its character and

distinctiveness, to maintain its vitality and viability but also recognising the presence of Green Belt boundaries which are drawn tightly around the town [ED031, 5.56, pg 40].

- 2.1.7 Outside of Newcastle and Kidsgrove the Rural Service Centres provide a range of essential services and facilities and are deemed capable of supporting a proportionate level of growth according to their individual scales, roles and character [ED031, 5.57, pg 40].
- 2.1.8 For the other settlements and rural areas tier of the hierarchy, although not a core focus of development through the Local Plan, housing growth could be delivered through a number of mechanisms including community led development, rural exceptions sites and neighbourhood plans. The Local Plan does not however propose allocations for settlements within this tier of the settlement hierarchy.
- 2.1.9 Accordingly, the focus of development on the larger urban settlements is justified and soundly based.

d) Would the pattern of development proposed meet the needs of rural centres? How were the proportions of development proposed for each settlement arrived at?

- 2.1.10 The pattern of development would meet the needs of rural centres in the Borough. These centres provide for a range of essential services and facilities and through the Local Plan are supporting an appropriate level of growth. The Local Plan does not take a prescriptive, defined one size fits all approach to rural centres. The level of growth proposed in rural centres is reflective of their role as villages and with the scale, type, density and design of development seeking to protect and where possible enhance their rural and historic character. It also seeks to deliver a sustainable pattern of development and recognises that a number of rural centres are surrounded by Green Belt, including the rural centres of Audley and Bignall End, Betley and Wrinehill, Madeley and Madeley Heath, Keele and Keele University. At the time of preparing the Final Draft Local Plan, a number of rural centres had existing commitments and completions from the start of the Local Plan period in 2020.
- 2.1.11 The proportions of development take account of top-down factors in terms of meeting housing and employment needs and were informed by the development of spatial options [ED031, 5.38 – 5.107]. They also reflect bottom-up factors such as the merits of site options balanced against the factors outlined above in 1.11 concerning the characteristics of individual settlements. The Housing and Employment Spatial Strategy Topic Papers include a detailed description of the factors which influenced the distribution of development in the Borough [ED031/ED032]. Specific discussion on the Rural Services Centres is contained, for example, at [ED031, paras 5.86 – 5.98, pgs 46-50], and in the Site Selection Report [ED029, pgs 31-53] which deals with each rural centre in turn in Chapters 8 through 12.
- 2.1.12 It is also important to note that Policy PSD3 sets out figures in the context of ‘in the order of’, the figures are presented as a guide and are not a ceiling nor a specific target [CD01, para 5.12, pg 17]. They are designed as a mechanism to direct growth and allocations in

the Plan to ensure that a sustainable pattern of development is delivered across the Borough.

e) Would it provide sufficient development within rural areas and other settlements?

2.1.13 Yes. The distribution of development focuses on the higher tiers of the settlement hierarchy (strategic, urban and rural centres). Rural areas and other settlements below these tiers of the hierarchy are not a focus of growth in the Local Plan. The remaining settlements in the rural area comprise smaller villages with limited facilities and infrastructure to support any form of strategic scale growth. Limited but justified housing growth in the wider rural area can be delivered through the mechanisms of community-led development, rural exception sites and via Neighbourhood Plans alongside where schemes are in conformity with policy PSD4: Development Boundaries and the Open Countryside. Policy criterion 4 of PSD3: Distribution of Development notes that the other settlements and rural area tier of the hierarchy will be expected to accommodate development but is not a focus for growth in respect of allocations included in the Local Plan.

2.1.14 See further the Council's answer to Qu 2.5 below addressing compliance with national policy on this issue.

f) Is the approach to development at Keele soundly based? Does it adequately address the needs of the University?

2.1.15 The approach to development at Keele is considered to be appropriate. The University is a campus-based university and separate geographically to Newcastle-under-Lyme. It is rural in character and situated in close physical proximity to Keele Village. Apart from education facilities it also contains heritage assets in the form of Keele Park and Gardens and sections of the campus are also located in and the wider site is tightly bounded by the Green Belt. The proximity of the University to Keele Village are closely linked in development form but also in terms of services and facilities, hence the approach to considering the area jointly through the designation of a rural centre.

2.1.16 The proportion of development directed to Keele and Keele University in the Local Plan is proportionately high (in the order of 800 homes), compared with the other rural centres (Loggerheads Rural Centre being the second highest at 450 dwellings) set out in policy PSD3: Distribution of Development. This level of development is considered to adequately address the needs of the University. The Plan seeks to allocate sites to support the needs of the University (site allocations KL13/KL15) including student accommodation. The allocations and approach set out in the Local Plan supports the core functions of the University and associated employment uses.

2.1.17 The proposals in the Plan seek to support the growth of the University and the adjoining science parks as employment uses alongside future residential student accommodation on the wider campus. The site allocations support the academic and core functions of the University alongside appropriate employment proposals. Delivery of the site allocations in the Plan should support the provision of a new / enhanced bus service alongside improved transport linkages to surrounding developments. The

proposals at the University are also supported by evidence in the Local Plan, including the Infrastructure Delivery Plan [CD16, 3.67-3.70, pg 155, 158-160,163,169,173, 183] and Strategic Transport Assessment [ED011, pg 66], alongside matters including the Heritage Impact Assessment [ED016, Part 1 Appendices A5,&A6] which has then informed the policy context for the site.

Qu 2.2 What is the evidential basis for the settlement hierarchy in policy PSD2? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

- 2.2.1 Demonstrated through the Infrastructure Delivery Plan [CD16] and the Retail & Leisure Study [ED010], the strategic centre of Newcastle under Lyme contains the largest range of services, facilities and sustainable transport connections in the Borough. The contiguous built form with Stoke is also significant in terms of the cross-boundary interactions that take place. With the extensive regeneration ambitions and focus of uses including civic, cultural and learning that attract large numbers of people, Newcastle-under-Lyme Town Centre functions as the principal town centre in the Borough. These aspects collectively illustrate the area as being the most sustainable location for growth and justify the extent of development contained in the Local Plan.
- 2.2.2 Kidsgrove, with its rail station (the only one in the Borough), benefitting from being a recipient of Central Government provided Town Deal Funding plays a secondary, but complementary role to the strategic centre, and in its position in the settlement hierarchy as an urban centre, represents a key location for growth of a scale appropriate to its character and distinctiveness. Again, these conclusions are based on the evidence base referred to in 2.2.1 and the evaluation of appraisals undertaken within [CD03 & CD05].
- 2.2.3 The Rural Area Topic Paper [ED005] differentiates between the relative sustainability of rural areas and their consequent potential to accommodate growth. Settlements in the rural area contain, by their very nature, a smaller level of service provision in relation to the higher order Strategic and Urban centres in the settlement hierarchy.
- 2.2.4 Table 3 of [ED005, pg 13] presents a visual illustration of the sustainability of settlements that results following the application of the methodology used to categorise the settlements detailed in the preceding Chapter 4 [ED005] and summarised in Table 2 [pgs 10-11]. The accompanying appendix 1 [pgs 16-26] presents the background context to each settlement's profile.
- 2.2.5 Two categories of rural settlements have therefore been defined:
- Rural Centres: These settlements provide a 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
 - Other Settlements & Rural Areas: These settlements contain a (very) limited number, 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.
- 2.2.6 The Borough Council recognises that, strictly, evidence of this nature can only ever truly represent a point in time. However, the Rural Topic Paper [ED005] and the methodology it applies, is considered to be robust and represent a contemporary picture. The assessment has also been reviewed in response to consultation feedback during the plan-making process (Regulation 18) and emerging and made neighbourhood plans. Accordingly, it is up to date.

- 2.2.7 As per the higher order settlements, other relevant aspects of the Local Plan's evidence base, such as the Infrastructure Delivery Plan [CD16] and the Retail & Leisure Study [ED010] are also relevant complementary illustrations of the nature of services and facilities within settlements, each of which has been published within the last twelve months.
- 2.2.8 Wider discussion on the proposed Spatial Strategy and the Site Selection process are provided within [ED029] and [ED031] (5.54-5.60 refers to the settlement hierarchy). The strategy has been influenced by a range of physical and environmental factors, such as (but not limited to) the risk of flooding; national and local environmental designations; and availability of health and education facilities. The settlement hierarchy and spatial strategy are considered to be of a scale and location that takes into account evidenced constraints, but which will sustainably support the vitality and viability of communities across the Borough. The settlement hierarchy has informed the development strategy by, amongst other things, the distribution of development as set out in Policy PSD3.

Qu 2.3 What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?

- 2.3.1 As outlined in the Housing Topic Paper [ED031, 5.67-5.107], a number of different spatial strategies were considered and refined from an early stage in Plan making, including through the Issues and Strategic Options (2022) and the Regulation 18 Local Plan (2023). This included consideration of New Settlement Options, Growth Direction Options, Assessment of Site Options, Reasonable Alternative Growth Scenarios, the approach to Strategic, Urban and Rural Service Centres.
- 2.3.2 A new settlement option was discounted as unreasonable through the development of the Local Plan. No options were submitted for consideration as part of the Local Plan process and development requirements could be met elsewhere [ED031, 5.70].
- 2.3.3 The Sustainability Appraisal (SA) has been a key tool to aid decision-making with regard to the spatial strategy. A range of reasonable alternatives for different aspects of the spatial strategy have been identified and evaluated in accompanying SA outputs, throughout the iterative SA and plan making process. The approach to reasonable alternatives in the SA process is described in Chapter 5 of Volume 2 of the Regulation 19 SA Report (2024) [CD03] and illustrated in the Council's response to Matter 1 (question 1.5)
- 2.3.4 A total of seven growth direction options have been considered during the SA process. These were identified, described and evaluated through the Regulation 18 stage (2023) and at Regulation 19 (2024).
- 2.3.5 Six growth direction options were assessed as part of the Regulation 18 SA (2023) [CD04], representing potential broad locations for new development:
- Growth Direction Option 1 – Development on strategic sites outside the Green Belt – large rural extensions;
 - Growth Direction Option 2 – Strategic Green Belt release for an urban extension – University Growth Corridor;
 - Growth Direction Option 3 – Green Belt release for development of strategic sites – Talke and Chesterton expansion;
 - Growth Direction Option 4– Green Belt release for development of strategic sites – Kidsgrove expansion;
 - Growth Direction Option 5 – Green Belt release for development of strategic sites – Audley Rural expansion; and
 - Growth Direction Option 6 – Combination of strategic sites across the borough comprising of both sites outside the Green Belt and sites which require Green Belt release.
- 2.3.6 A further growth direction option was assessed as part of the Regulation 19 SA (2024) (see Appendix D [CD03]), to provide clarity on the evolution of the spatial strategy:
- Growth Direction Option Zero – Maximising development within development boundaries, including density uplift within town centres and at locations well served by public transport.

- 2.3.7 A number of growth options were considered at the Issues and Options Stage and continued to be refined during the Plan making process. The Housing Topic Paper sets out a description of the various growth options considered and the reasons for discounting or taking those options forward. Growth Direction Zero (maximise growth within development boundaries and increase density in centres) is common to all of the other growth directions and was discounted as a standalone option as development requirements could not be achieved within development boundaries alone. Growth Direction 6, Hybrid Option was taken forward and consulted upon at Regulation 18 stage in the First Draft Local Plan. The Housing Topic Paper sets out how the Hybrid option was further refined with reference to site options and the settlement hierarchy and the wider spatial strategy [ED031, 5.79-5.88].
- 2.3.8 No single best performing option was identified in the SA process although the relative benefits and challenges of each were discussed in the evaluation. Taking into account the SA findings and other evidence base information, NuLBC selected Growth Direction Option 6, which additionally reflects the outcomes of Option Zero as a starting point, recognising that it represents a balanced approach that seeks to support development in the strategic and urban centres whilst supporting a smaller scale of development in the rural areas allowing for sustainable patterns of development across the borough.
- 2.3.9 Having selected Growth Direction Option 6 as a preferred option, the Council identified four growth scenarios to provide further clarity on the spatial definition associated with growth under this strategy, based on different proposed employment allocations including strategic employment sites (Figure 1).

Growth scenario option	Employment land supply	Strategic employment sites	Gross employment land supply
Growth Scenario 6a	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> No strategic sites. 	69.6ha
Growth Scenario 6b	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) KL15 Land South of A525 between Keele University and Newcastle (13ha) 	104.6ha
Growth Scenario 6c	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> AB2 Land adjoining corner of A500 and M6 Southbound (22ha) TK30 Land off Talke Road and A500, Talke (51ha) 	142.6ha
Growth Scenario 6d	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	<ul style="list-style-type: none"> KL15 Land South of A525 between Keele University and Newcastle (13ha) TK30 Land off Talke Road and A500, Talke (51ha) 	133.6ha

Figure 1: Growth Scenarios Identified

- 2.3.10 Evaluation in the SA process revealed that Options 6b and 6d performed similarly and were considered to be the best performing options overall, supporting employment skills and training opportunities to a greater extent than 6a/6c owing to the support for growth within the University of Keele Growth Corridor.
- 2.3.11 Taking into account the SA finding and other evidence base information (including the Strategic Employment Sites Assessment [ED002], Growth Scenario 6 was selected, recognising that it supports the anticipated level of employment / jobs growth in the borough.
- 2.3.12 The directions of growth have also been reflected and tested through the Sustainability Appraisal. This is illustrated in Figure N.6 [CD03, pg N27] and considered through Chapter 5 [5.5.1 – 5.5.8, pgs 35-37] and Appendix D of the Sustainability Appraisal. The reasons for selection and rejection of growth direction options are set out in Table D.4.3 of the Sustainability Appraisal [CD03, pg D26].
- 2.3.13 The Housing Topic Paper outlines how the Spatial Strategy took account of comments made to the First Draft Local Plan [ED031, 5.89-5.107] and refined Growth Direction 6 to take account of updated evidence. Table 2 of the Housing Topic Paper sets out the proposed changes made to the Regulation 18 Spatial Strategy [ED031, pg 53] for consultation at that stage. Table 3 [ED031, pg55] sets out the proposed approach at the Regulation 19 stage.
- 2.3.14 As set out above, although not directly relevant to policy PSD3, it is also noted that following consultation on the First Draft Local Plan, a number of growth scenarios were considered which built upon the hybrid option in Growth Direction 6 but with particular relevance to employment uses. The consideration of growth scenarios (options 6a – 6d) were also considered in the Sustainability Appraisal [CD03, 5.6.1-5.6.6, pgs 38-39 and Table D.5.1 and section D.5 of Appendix D, pgs D28-D29] and are described in the Employment Spatial Strategy Paper [ED032, 5.47 – 5.52, pgs 32-35]. As set out above, Growth Direction 6b became the preferred growth scenario.

Qu 2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process? Is the site selection process transparent? - How were different development constraints taken into account? Were they identified using up to date and appropriate evidence and guidance?

- 2.4.1 The sites were chosen following a thorough site selection and assessment process, which considered a wide range of alternative sites put forward at different stages in the preparation of the Local Plan. The reasons for their selection and the rejection of alternatives have been explained and justified in the site selection report (“SSR”) [ED029] and Sustainability Appraisal of site options in reasons for selection and rejection [CD03, Appendix I]. Table I.1.1 gives details for each site, states whether it was selected or rejected, and gives outline reasons for the choice.
- 2.4.2 The site selection process followed a clear 7 stage site selection methodology as set out in paragraph 2.1 of the SSR [ED029]. Sites considered through the Strategic Housing Land Availability Assessment (“SHELAA”) provided a pool of sites to consider. Call for sites opportunities were open throughout the Plan making process, including through consultation stages on the Local Plan to be considered through the SHELAA. There was then a first site sift process to generate a list of sites to consider further through the SSR process. A site appraisal was prepared for each site option that passed through the site sift. Through the site selection process, a decision was taken for each tier of the settlement hierarchy as to the extent of allocations considered to be required for that particular area. Where it was considered necessary to continue the site selection process, there was then a process undertaken to allocate sites, informed by the Sustainability Appraisal, Habitats Regulations Assessment and other relevant evidence base documents listed at para 1.4 of the SSR]. Stage 5 of the SSR considered and evaluated the site options in a local area, focusing initially on non-Green Belt sites and then, if required, moving on to consider Green Belt sites should exceptional circumstances apply. Through the site selection process, a large list of reasonable alternatives were considered and a site-specific assessment undertaken.
- 2.4.3 There were consultation stages with relevant stakeholders built into the site selection methodology, including at the First Draft Local Plan consultation stage before the final site sift and selection in the Regulation 19 version of the Local Plan, as documented in the SSR [ED029] at paras 2.17-2.18, pg 6.
- 2.4.4 As noted above and set out in paragraph 1.4 of the SSR [ED029], the report and its conclusions were informed by several evidence base documents including the Strategic Flood Risk Assessment, Green Belt Assessment, Infrastructure Delivery Plan and other relevant documents.

Were constraints given relative weight in the site selection process? If so, how was this determined?

- 2.4.5 The site selection criteria have not been pre-weighted. The proformas provide a way of presenting information about the characteristics, constraints, capacities and circumstances of sites in a consistent way that enables this, along with other factors to form part of the overall site selection process, and ultimately the recommendation of whether or not a site is included in the Local Plan.

In relation to flood risk, were sites at low risk preferred over those at greater risk? How did Strategic Flood Risk Assessment (SFRA) inform site selection?

- 2.4.6 The approach to Flood Risk is set out in the Council's Note to the Inspector [EX/NBC/05]. The early stages of the site selection process, at stage 2, considered at a site sift stage, whether there was the presence of a significant proportion of a site in a Flood Zone 3, in which case sites were excluded, unless evidence or modelling suggested otherwise. Flood Risk was then also a consideration in the site proformas prepared and formed part of the evaluation of the suitability of site options. This evaluation process considered the outcomes of the level 1 strategic flood risk assessment as noted in paragraph 1.4 of the SSR [ED029]. Individual judgements were then made for each site, based on the range of factors outlined through the SSR and also informed proposed policy wording for draft allocations.
- 2.4.7 As noted at para 3.2 of [EX/NBC/05] the SHELAA methodology employed both a precautionary and a sequential approach to initial site identification. The SFRA Level 1 assessment informed both the initial sifting of sites and the more detailed site assessments undertaken as part of the site selection process [ED029].
- 2.4.8 Following feedback from the Environment Agency and other partners at Regulation 19 stage, the Council has undertaken a level 2 Strategic Flood Risk Assessment which confirms the Council's approach to flood risk in the Borough [EX/NBC/06a]. Para 3.2 of [EX/NBC/05] sets out the approach taken by the Level 2 SFRA, the result of which was detailed site specific evidence demonstrating that Flood Risk had been appropriately considered for those allocated sites with potential flood risk issues.
- 2.4.9 Moreover, as para 3.3 of [EX/NBC/05] explains, an approach seeking to direct development to areas at lower risk of flooding is embedded within Local Plan in various ways. First, by the Planning for Sustainable Development (PSD) policies contained in Chapter 5 of the Local Plan. Second, by the specific Policies SE3 (Flood Risk Management) and SE4 (SuDS). Third, by the requirements of Policy SA1 (General Site Requirements) and the site specific flood risk requirements.

Qu 2.5 Do policies PSD3 and PSD4 allow sufficient development in rural centres, rural areas and settlements to comply with para 83 of the Framework? Are the proposed settlement development boundaries appropriately drawn? What factors were taken into account in designating these?

- 2.5.1 The Council considers that the Local Plan's policies, principally PSD2 (Settlement Hierarchy), PSD3 (Distribution of Development), and PSD4 (Development Boundaries and the Open Countryside), provide a positive framework for sustainable development in the rural areas of the borough, consistent with paragraph 83 of the NPPF. Paragraph 83 seeks to ensure housing is located where it will enhance or maintain the vitality of rural communities, identifying opportunities for villages to grow and thrive, particularly where this supports local services.
- 2.5.2 The Plan's Settlement Hierarchy (Policy PSD2) identifies six Rural Centres (Audley and Bignall End (Joint); Baldwins Gate; Betley and Wrinehill (Joint); Keele Village (with University Hub); Loggerheads; Madeley and Madeley Heath (Joint)). The methodology for identifying these centres, detailed in the Rural Area Topic Paper [ED005, Section 4, pg. 4], identifies a range of essential services and facilities necessary to meet day-to-day needs and function sustainably. Policy PSD3 directs a proportionate quantum of housing development to these Rural Centres (approximately 2,000 dwellings in total [Policy PSD3, criterion 3]). The Council considers that this level of growth directed to the Rural Centres, representing 25% of the Plan's total housing requirement, provides a sufficient and proportionate basis for supporting their vitality and local services, consistent with NPPF paragraph 83.
- 2.5.3 For settlements identified as Other Settlements and Rural Areas in Policy PSD2, where significant growth is not proposed, the Plan still provides appropriate opportunities for development necessary to support rural vitality and meet local needs. Policy PSD4 permits development within defined settlement boundaries where it is in keeping with the scale, role, and function of the settlement [Policy PSD4, criterion 2].
- 2.5.4 Crucially, outside defined settlement boundaries, Policy PSD4 allows for specific types of development under criterion 3, provided certain conditions are met. This includes residential development for essential rural workers (Policy RUR2), development with an operational need for a countryside location (e.g., agriculture, forestry – Policy RUR1), rural business expansion (Policy RUR1), limited extensions (Policy RUR3), re-use of rural buildings (Policy RUR5), replacement buildings (Policy RUR4), and limited infill. These criteria-based policies provide flexibility for appropriate development that directly supports the rural economy (e.g. RUR1) and meets essential local housing needs (e.g. RUR2, HOU8, HOU9), thereby enhancing or maintaining the vitality of rural communities, consistent with facilitating opportunities for villages to thrive.
- 2.5.5 Furthermore, the Plan makes specific provision for affordable housing delivery in rural areas through Policy HOU8 (Rural and First Homes Exception Sites) and Policy HOU9 (Community Led Exception Sites). These policies allow for exceptions to normal policy constraints on sites adjoining settlement boundaries, specifically to meet identified local affordable housing needs, thereby directly supporting the sustainability and vitality of rural communities.

- 2.5.6 The Council therefore considers that the Plan takes a positive and proportionate approach, compliant with NPPF paragraph 83, by directing growth to the most sustainable Rural Centres while allowing for specific, appropriate development in the wider rural area through criteria-based policies and exception sites.
- 2.5.7 The Council considers the settlement boundaries defined on the Policies Map [CD02] to be appropriately drawn. The boundaries define the built limits of the Strategic Centre, Urban Centre, and Rural Centres, distinguishing these from the open countryside where development will be more restricted [Policy PSD4, criterion 1].
- 2.5.8 The boundaries were reviewed and defined using a robust and consistent three-stage methodology, as detailed in the Settlement Boundary Review Report [ED007, Section 4, pg. 12]. This methodology ensures boundaries reflect the Local Plan strategy, are responsive to existing development patterns and physical features, and are clearly defined. The consistent application of this methodology ensures the boundaries are appropriately drawn, reflects the current form and function of settlements, and provides a clear basis for decision-making.
- 2.5.9 The factors considered when designating boundaries are clearly set out within the methodology section of the Settlement Boundary Review Report [ED007, paras 4.6-4.11, pg. 13]. These factors included:
- Stage 1:** Allocated Sites: Incorporating sites allocated for development in the emerging Local Plan.
- Stage 2:** Consideration of the Built-Up Area: Assessing the relationship to the existing built-up area, including extant planning permissions and the physical form and functional relationship of land to the settlement.
- Stage 3:** Consideration of Physical Features: Using clear and permanent physical features (e.g., roads, railway lines, water bodies, woodland edges, established field boundaries) to define the boundary wherever possible, ensuring it is easily identifiable and defensible. Green Belt boundaries were also a key consideration where relevant [ED007, paras 4.1-4.5, pg. 13].
- 2.5.10 The application of this methodology to each settlement is detailed in Appendix 1 of the Settlement Boundary Review Report [ED007, pgs 17-27, with supporting maps at pgs 28-37].

Qu 2.6 What are the Plan's assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans? Are these soundly based?

- 2.6.1 The Local Plan does not make any assumptions about the timing and amounts of development to be delivered through neighbourhood plans. The Local Plan seeks to meet identified requirements for residential and employment uses alone, when considered alongside existing commitments and completions. The Local Plan supports the allocation of sites through Neighbourhood Plans and the types of relevant considerations to support the delivery of the development requirements, set out in policy PSD1 'Overall Development Strategy'.

Qu 2.7 Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?

- 2.7.1 It is the Council's position that no proposed modifications are required to policies PSD2: Settlement Hierarchy and PSD3: Distribution of Development in the Local Plan. In respect of flexibility, policy PSD3 notes in the supporting text that the figures presented in the policy are intended as a guide and are neither a ceiling nor a specific target [CD01, para 5.12, pg 17]. The supporting text to policy PSD3 also notes that housing growth in the wider rural area can be delivered through mechanisms in the Plan including community-led development, rural exception sites, Neighbourhood Plans [CD01, para 5.21] but also through conformity with the policy approach set out in policy PSD4: Development Boundaries and the Open Countryside.

2. Appendix 1 – List of Reference Documents

A. The Council's evidence for the spatial strategy for the Local Plan is set out below.

B. National Policy:

- National Planning Policy Framework (December 2023)
- National Planning Practice Guidance

C. Government Regulations and Acts:

- Town and Country Planning Act
- Planning and Compulsory Purchase Act 2004

D. Newcastle-under-Lyme Local Plan Submission / Examination Documents

- CD01 Local Plan
- CD02 Local Plan Policies Map
- CD03 Sustainability Appraisal
- CD05 Habitats Regulations Assessment
- CD16 Infrastructure Delivery Plan
- ED005 Rural Area Topic Paper
- ED006a Strategic Housing and Employment Land Availability Assessment
- ED007 Settlement Boundary Review
- ED008 Green Belt Assessment (Part 4)
- ED010 Retail and Leisure Study
- ED011 Strategic Transport Assessment
- ED013 Strategic Flood Risk Assessment
- ED016 Local Plan Heritage Impact Assessments
- ED029 Site Selection Report and Assessments
- ED031 Housing Spatial Strategy Topic Paper
- ED032 Employment Spatial Strategy Topic Paper
- EX/NBC/06 (and appendices) Level 2 Strategic Flood Risk Assessment