

Hearing Statement – Matter 2

For The Strategic Land Group Ltd | 17-426

Newcastle Under Lyme Local Plan 2020-2040 examination



Project: 17-426
Hearing: Matter 2
Client: The Strategic Land Group Ltd
Date: 30 April 2025

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1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as “SLG”) to attend the examination of the Newcastle Under Lyme Local Plan 2020-2040. SLG is promoting draft allocation TK27: Land off Coppice Road, Kidsgrove.
- 1.2 This hearing statement sets out our response to the Inspector’s Matters, Issues and Questions in relation to Matter 2 - Vision and Objectives, the Spatial Strategy, and the Site Selection Process (Policies PSD1, PSD2, PSD3, PSD4). It should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the plan and our other Hearing Statements submitted to the examination.



2. SLG response to the Inspectors' questions

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

Q2.1 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:

b) To what degree is the distribution of development set out in Policy PSD3 based on the settlement hierarchy in Policy PSD2?

- 2.1 Under Policy PSD3, 5,200 new homes are distributed to the strategic centre of Newcastle-under-Lyme. In contrast, only 800 new homes are distributed to the urban centre of Kidsgrove.
- 2.2 Policy PSD2 recognises that Kidsgrove benefits from a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. Furthermore, Kidsgrove railway station is the only mainline train station in the borough, which also provides direct links to a range of local and national destinations including Manchester and London. The rail station at Kidsgrove is very important for the borough and represents a key opportunity when considering the distribution of development.
- 2.3 Kidsgrove is therefore a highly sustainable and it could accommodate an even greater proportion of the proposed housing requirement than currently proposed in the plan.

c) Is the focus on the larger urban settlements justified and soundly based?

- 2.4 Yes. Newcastle-under-Lyme and Kidsgrove are by far the largest settlements in the borough, providing a wide range of services and facilities, and they are the most sustainable locations for growth.

Q2.2 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?

- 2.5 Our client's key interest in the borough relates to Kidsgrove, which is identified as an urban centre. That is effectively the second tier of the hierarchy below the strategic centre of Newcastle-under-Lyme.



Kidsgrove is also identified within the policy as a 'key location for growth'. This is strongly supported on the basis that Kidsgrove is an important centre in the borough and a highly sustainable location for accommodating future growth.

Q2.4 Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

- 2.6 A total of 177 reasonable alternative sites were identified, described and evaluated throughout the Plan and Sustainability Appraisal process. The sites were assessed before and after Local Plan policy mitigation is applied (see Appendix H of the Sustainability Appraisal).

- Is the site selection process transparent ?

- 2.7 Yes. The Site Selection Report (ED029) sets out a 7-stage methodology that the Council has applied in allocating sites. The Site Selection report sets out a logical approach to site selection and the overall approach taken is considered to be robust. The Council's reasons for selection and rejection of sites is set out in Appendix I of the Sustainability Appraisal (see Volume 3).

- 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?

- 2.8 The evidence base contains a Stage 1 and Stage 2 SFRA which addresses this issue in some detail, including the implications of the recent changes to the EA mapping of surface water flood risk. But as recognised in a recent appeal decision¹, the Environment Agency's (EA) RofSW maps have inherent limitations which result in the fact that they cannot be used to undertake a full assessment of risk 'at any scale'. The SFRA Addendum correctly identifies that further assessment of the potential impacts of climate change on surface water will need to be considered at the site-specific FRA stage, and that there may be a need to undertake further surface water modelling as part of a site-specific FRA.

Word count: 585

¹ APP/A2335/W/24/3350855 – Land west of Sea View Drive, Hest Bank, Lancaster dated 14 March 2025 (see paragraph 77)



