



Newcastle-under-Lyme Local Plan Examination in Public Hearing Statement

Matter 2: Vision and Objectives, the Spatial Strategy and
Site Selection Process

On behalf of Persimmon Homes (North West) Ltd.

[In relation to Site Ref TB23:](#)
Land to the West of Galingale View

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1 INTRODUCTION

- 1.1 Asteer Planning LLP has been instructed by Persimmon Homes (North West) Ltd (“Persimmon”) to prepare this Hearing Statement in relation to the Newcastle-under-Lyme (“NUL”) Local Plan 2020-2040 Submission Draft (“Submission Plan”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspector.
- 1.2 Persimmon controls land to the Land to the West of Galingale View (“the site”) which is allocated for residential development as Site TB23 – and which has been promoted through the entirety of the Local Plan process. The site is wholly deliverable (being suitable, available and achievable) for residential development as demonstrated robustly by the evidence presented in duly made representations in August 2023 (at Regulation 18 Stage) and in October 2024 (at Regulation 19 Stage), which have been supported by a Vision Document and Masterplan.
- 1.3 This Statement responds directly to the Inspectors MIQs at Matter 2; however, it should be read in parallel with our detailed Regulation 19 representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this Hearing Statement:
- Matter 5 – Housing Supply
 - Matter 6 – Allocations

2 VISION & OBJECTIVES AND SPATIAL STRATEGY

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?

- 2.1 Persimmon supports the identification of Newcastle-under-Lyme as the Borough's "Strategic Centre", which sits at the top of the settlement hierarchy in Policy PSD2 and is therefore a focus for growth in the Borough. Persimmon also supports the identification of Site TB23 within the Strategic Centre, recognising the potential of the site to contribute to meeting the housing needs of the Strategic Centre on a vacant and underutilised site that is within the settlement boundary.
- 2.2 Persimmon supports the largest proportion of the Borough's identified need being directed to Newcastle-under-Lyme, in line with its role as the Strategic Centre and status at the top of settlement hierarchy. The site is also in a location that can support the westwards expansion of Newcastle-under-Lyme, which will support Keele University as an internationally recognised institution and support a University growth corridor by delivering the type and quality of homes that will underpin growth on the western urban edge of Newcastle-under-Lyme.

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?

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?

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

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?

- 2.3 The Council's evidence base supports the allocation of the site and provides a sound basis for its inclusion in the Local Plan. The Site Selection Report (2024)¹ considers that the

¹ Document ED029

site is “available”, achievable” and “viable”, and therefore suitable for residential development. The summary proforma for the site states that:

“The site is located within the Newcastle urban area, and promoted for housing development and open space. The land is flat and is in close proximity to existing residential development. It is also close to Walley's Quarry which could raise amenity concerns. A small part of the site within the eastern boundary is identified as high quality / low value Natural and Semi-Natural Greenspace in the Open Space Strategy 2022. The developable area takes this into account. Flood zones 2 and 3 are confined to a very small area within the north-western boundary. Developable area calculation takes both of these into account. The site has access to some services and facilities. Access points along Galingale View. The site is considered to be available, viable and suitable for allocation in the Local Plan Taking into account and balancing the range of factors considered in the SSM and summarised above, alongside the outcomes of the Sustainability Appraisal / Habitats Regulations Assessment and relevant evidence base it is recommended that this site is included as an allocated site in the Local Plan subject to appropriate policy wording”.

- 2.4 Persimmon supports this site assessment and the subsequent allocation policy, and has robustly demonstrated how any site considerations can be mitigated as part of its Vision Document (submitted along its Regulation 19 Representations). The deliverability of Site TB23 is considered in more detail in our Matter 6 Hearing Statement.
- 2.5 In terms of the Council's approach to flood risk assessment and site selection, Persimmon notes the further information submitted in relation to flood risk in March 2025, including a Level 2 SFRA and a note on the approach to site selection on sites with flood risk (Document EX/NBC/05). Persimmon consider that the Council has undertaken a sound, rigorous and thorough assessment of Flood Risk as part of its evidence base, including:
- In its Strategic Housing and Employment Land Availability Assessment (“SHELAA”) Methodology (Document ED006) and SHELAA Report (Document ED006a) - which included a ‘filtering’ stage that excluded sites largely with significant areas of Flood Zone 3 and identified potential sites from several sources, including a ‘call for sites’, analysis of brownfield sites, a review of existing planning permissions and review of existing allocations.

- As part of a Level 1 Strategic Flood Risk Assessment ("SFRA") (Document ED013), which was prepared by JBA Consulting (June 2024) provided a comprehensive, borough-wide assessment of flood risk from all sources. This included an initial "sifting" of potential development sites within the SHELAA, informing the more detailed site assessments undertaken as part of the site selection process (Document ED029) and provided a baseline for a Level 2 SFRA.
- Preparing a more detailed Level 2 SFRA (Document EX/NBC/06b), which was undertaken by JBA Consulting in January 2025. This assessment provided site-specific evaluations of flood risk, providing detailed, site-specific evidence to demonstrate that flood risk has been appropriately considered for those allocated sites with potential flood risk issues, in accordance with the NPPF and PPG.
- Following a spatial approach in the Submission Plan that embeds flood risk strategic policies and its specific development management policies. Policies PSD1, PSD2, PSD3, PSD4, and PSD5 establish the overall spatial strategy, inherently supporting a sequential approach by directing development towards existing settlements, prioritising previously developed land, and restricting development in the open countryside and Green Belt.

2.6 Persimmon consider that the Sequential Test has been robustly applied in the preparation of the Local Plan, in accordance with the NPPF and PPG. The application of the Sequential Test has been a fundamental part of the overall site selection process and has helped shape the spatial strategy for the plan, as set out in policies PSD1, PSD2 and PSD3.

2.7 Further comments on the Councils recently submitted Level 2 SFRA in relation to the site are provided in our response to Matter 6.