

# Hearing Statement – Matter 3

For The Strategic Land Group Ltd | 17-426

Newcastle Under Lyme Local Plan 2020-2040 examination



Project: 17-426  
Hearing: Matter 3  
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 3 – Green Belt (Policy PSD5). 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 3 - Whether the approach to the alteration of the Green Belt and development within it is justified and consistent with national policy**

**Q3.3 Are there exceptional circumstances to alter the Green Belt in the Borough in principle? If so what are they? If not, how do you consider housing and employment needs could be met?**

- 2.1 The Green Belt Assessment sets out evidence in relation to exceptional circumstances. Table 4 of ED008a sets out in some detail the evidence supporting the exceptional circumstances in relation to Newcastle-under-Lyme, having regard to other cases in England. It is apparent from the evidence base in relation to both housing need and supply that a significant amount of Green Belt release will be needed to meet housing needs. There is also a specific need to release Green Belt around Kidsgrove, to provide an appropriate level of growth within the urban centre in accordance with the spatial strategy. Therefore, there are exceptional circumstances at the strategic level to justify Green Belt release.
- 2.2 At a site-level, paragraph 4.4 of the Green Belt Assessment Part 3 (ED008a) sets out a range of exceptional circumstances for the Council to consider. We address this in relation to our client's specific site under Matter 6, but in principle, the evidence base identifies exceptional circumstances at both a strategic and site specific level.

**Q3.4 The Council has produced a Green Belt Assessment (ED8, 8a, 8b, 8c). Is the Council's approach to assessing Green Belt appropriate? What are your reasons for this view?**

- 2.3 Arup has undertaken a number of Green Belt Reviews on behalf of the Council consisting of the following:
- Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1 (November 2017);
  - Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 2 (2019-20) consisting of a Green Belt Site Review, Exceptional Circumstances Review and Green Belt Village Study;
  - Newcastle-under-Lyme Green Belt Review Part 3 (2023) consisting of advice on safeguarded land, compensatory improvements, and exceptional circumstances, plus additional Green Belt site assessments;
  - Newcastle-under-Lyme Green Belt Review Part 4 (2024) consisting of a Green Belt Site Review; and,



- Green Belt Village Study Green Belt Village Study (2024).

- 2.4 These reports comprise submission documents ED008 – ED008d and ED009.
- 2.5 The assessment has regard to national policy and the purposes of including land within the Green Belt. Whilst it is reasonable to question the planning judgements made in relation to the assessment of specific land parcels, in overall terms the assessment comprises an objective, comprehensive and proportionate assessment which is suitable for informing the site selection process.

### **Q3.5 Has the Green Belt Assessment adequately assessed the suitability of individual sites and their contribution towards the purposes of including land in the Green Belt? Are there any omissions in the policy?**

- 2.6 We address the contribution of our client’s site (proposed allocation TK27) under Matter 6. In summary, the Green Belt Assessment concludes that the site makes a *“moderate contribution to Green Belt purposes”*, and that *“overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt”*. We consider that the site in fact makes a ‘weak contribution’ to the Green Belt purposes, and this is emphasised by the Government’s latest guidance in relation to assessing the Green Belt purposes.

### **Q3.7 Has the Green Belt Assessment adequately addressed the cumulative effects of Green Belt release?**

- 2.7 Cumulative effects were considered through Part 4 of the Green Belt Assessment (see ED008, section 3 – methodology and Appendix F – site assessments, Green Belt Implications section).

## **Implications of the NPPF (2024)**

### **Q3.9 How relevant to this Examination are the provisions of the NPPF2024?**

- 2.8 Paragraphs 234 and 235 of the new Framework are clear that this plan is to be examined under the relevant provisions of the previous Framework. Therefore, the Council’s approach to Green Belt and its Green Belt Assessment must be considered against the previous Framework. It is not necessary to undertake a Green Belt Review to identify Grey Belt land under the guidance set out in paragraph 64-002-20250225 of the PPG.



### Q3.11 Will the “Golden Rules” have any implications for proposed sites?

- 2.9 No. The Golden Rules do not apply to the proposed allocations as the plan is being examined against the policies of the previous Framework. But in any event, the plan is supported by a Viability Study (ED004) which clearly demonstrates that 50% affordable housing is not viable across the plan area. Paragraph 67 of the Framework is clear that less than 50% affordable housing is acceptable if a higher proportion would make the development of sites unviable.

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