



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

Matter 6 - Housing Allocations

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 Housing Allocations.

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

Issue 6 – Are the proposed housing allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

Qu 6.1 Do the sites allocated for residential development provide an appropriate range of sites in terms of their type and size?

- 6.1.1 The sites proposed to be allocated for residential development in the Local Plan provide for a mixed portfolio of sites across the Borough ranging in sizes from 5 ranging to up to 900 dwellings.
- 6.1.2 The housing allocations are justified as they have been considered through the site selection report [ED029] which has included the input from a suite of evidence base documents including flood risk, Green Belt, and others [ED029, para 1.4] Reasonable alternative site options have also been considered through the Sustainability Appraisal [CD03]. The site selection report has considered the necessary availability, suitability, and viability of sites, in their delivery.
- 6.1.3 The sites allocated are effective as the Local Plan provides an appropriate policy context for each proposed site allocation which directly address matters identified through the completion of the site selection report [ED029]. This approach is then supported by the policies contained within the Local Plan, including policy SA 1 (General Requirements) [CD01, pg105] which applies, where relevant, to sites identified for allocation in the Local Plan.
- 6.1.4 The Plan Supply and Housing Trajectory Paper [EX/NBC/04] sets out the anticipated delivery of the site allocations proposed in the Plan including sites identified as being deliverable within 5 years and those developable sites beyond the initial 5-year period of the Local Plan. This approach is consistent with paragraph 69 of the National Planning Policy Framework ("NPPF") which asks local plans to identify a mix of sites and identify a supply of specific deliverable sites for five years following adoption and a specific developable supply of homes for years 6-10 and where possible, for years 11-15 of the remaining Plan period.

**Qu 6.2 Are the requirements of Policy SA1 sound? are there any omissions from the policy?
Is it consistent with national policy?**

- 6.2.1 The approach to Policy SA1 sets out several general requirements applicable the sites proposed for allocation. It is anticipated that all sites allocated in the Plan should conform to the general requirements outlined in table 6 of the Local Plan [CD01, pg. 105 – 111]. The requirements have been informed by the outcomes of the site selection report [ED029] and associated evidence documents. The requirements reflect the policy requirements set out in the Local Plan and are consistent with national policy.
- 6.2.2 Following the completion of a number of statements of common ground documents, it is considered that modifications are proposed policy SA1, outlined in MOD129 and MOD 130, to add additional text to the biodiversity and geodiversity section of Table 6.

Qu 6.3 Are the sites allocated for housing sound, and in particular for each of the sites listed below:

AB12 Land East of Diglake Street	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered fully in the site selection process, evidenced in ED029 [Appendix 2, Pg 95] and considered matters including access, heritage impacts and the location of the site in the Green Belt. The policy has considered these impacts in terms of items 2,3,4 and 5 which includes the requirement for a heritage impact assessment the strengthening of boundaries to support the pattern of enclosure within the site.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy AB12 [CD01, pg. 114] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): this is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Diglake Street). This clearly defined access point. It is justified based on the site's location and existing highway network, as identified through the site assessment process [ED029]. • Requirement 3 (Parking provision) provides for additional car parking within the site and contributions towards off-site highway improvements. • Requirement 4 (Layout) provides for a landscape led approach recognising the location of the site at the edge of the settlement. • Requirement 5 (Heritage Impact Assessment) to recognise the sites proximity to the Audley Conservation Area and nearby assets. • Requirement 6 (Archaeological programme) is required following the completion of the Council's Heritage Impact Assessment prepared for the site [ED016] • Requirement 7 (Boundaries) supports the retention and strengthening of boundaries to the site to recognise the Green Belt location of the site. • Requirement 8 (Open space) required to recognise the Council's terraced character. • Requirement 9 (Public Rights of Way) to support the locational sustainability of the site, linking also to Albert Street Play Area • Requirement 10 (Flood Risk) is required to recognise that impacts of all sources of flooding should be managed on the site. • Requirement 11 (Sewers) is required to recognise the sites proximity to infrastructure adjacent to the western boundary of the site.

	<ul style="list-style-type: none"> Requirement 12 & 13 (Site contributions) recognises that the site should provide contributions to local schools [CD12, pg. 161] and health facilities [CD12, pg. 162] (alongside open space) in line with the Infrastructure Delivery Plan.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes, the indicative yield is stated in policy [CD01, pg. 114] and derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The site falls in Value Area 1 in the viability assessment [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage.</p> <p>The site is supported by a Statement of Common Ground with the site promotor [EX/NBC/04 Appendix 3, pg. 91-95] that indicates that the site is deliverable in the first five years of the Local Plan, post adoption, to inform the timescales set out in the Housing Trajectory [EX/NBC/04, Appendix 2].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities, alongside open space. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Viability is addressed in point (c) above. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 91-95] agrees that the site is deliverable. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	<p>The Council does not consider there to be any significant omissions from the policy. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 125 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 & CD15a]. No modifications are proposed by the Council to Policy AB12. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>

AB33 Land off Nantwich Road	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Site constraints have been considered fully in the site selection process, evidenced in ED029 [Appendix 2, pg. 115]. The site selection process identified potential issues associated with heritage impacts and the location of the site in the Green Belt. The policy has considered these impacts in terms of the requirement for a heritage impact assessment [criteria 5] the strengthening of boundaries to support the pattern of enclosure within the site [criteria 4]. Given the historical uses of the site, a land contamination assessment is also required on the site [criteria 9].
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy AB33 [CD01, pg. 116] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): this is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access) confirms the anticipated access arrangements to the site via Park Lane • Requirement 3 (Connectivity) requests that the site improve connectivity to surrounding and existing cycle and pedestrian routes. • Requirement 4 (Site Layout) is required to support the design and layout of the site being appropriate to the location of the site in the Green Belt. • Requirement 5 (Boundaries) confirms the need to strengthen the site boundaries within the remaining Green Belt and provide for appropriate landscape buffers given its edge of settlement location. • Requirement 6 (Sewers) notes that development should avoid impacts on the local Sewer network. • Requirement 7 & 8 (Heritage Impact Assessment) recognises the outcomes of the Council's Heritage Impact Assessment for the site and requires a future planning application to consider such matters, as the site comes forward. • Requirement 9 (Financial Contributions) recognises that the site should provide contributions to local schools [CD12, pg. 161] and health facilities [CD12, pg. 162] in line with the Infrastructure Delivery Plan.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes, the indicative yield is stated in policy [CD01, pg. 117] and derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The site falls in Value Area 1 in the viability assessment [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage.

	The site is supported by a Statement of Common Ground with the site promotor [EX/NBC/04 Appendix 3, pg. 102-104] that indicates that the site is deliverable in the first 5 years of the Local Plan, post adoption in the timescales set out in the Housing Trajectory [EX/NBC/04, Appendix 2].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities, alongside open space. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 102-104] agrees that the site is deliverable. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from the policy. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 55 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15& CD15a]. A modification is requested to Policy AB33 [CD015a, MOD141] to make appropriate reference to the need to prepare a flood risk assessment for the site. The policy as drafted in the submission Local Plan [CD01] is considered sound.

AB15 Land North of Vernon Street	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered fully in the site selection process, evidenced in ED029 [Appendix 2, pg. 98]. The site selection process has identified potential heritage impacts and the impacts of the site which is currently within the Green Belt. The policy has considered these impacts in terms of the requirement for a heritage impact assessment [criteria 7] the strengthening of boundaries to support the pattern of enclosure within the site [criteria 5]. Given the historical uses of the site, a land contamination assessment is also required on the site [criteria 3]</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy AB15 [CD01, pg. 116] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): this is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access) confirms the access arrangements into the site. • Requirement 3 (Land contamination assessment) recognises the historical uses of the site. • Requirement 4 (Layout) asks that the development of the site is landscape led. • Requirement 5 (Boundaries) is required to recognise the site's location in the Green Belt and to support enclosure in the site. • Requirement 6 (Distance to sewer) is required given the location of site and the proximity of a sewer to the site. • Requirement 7 (Heritage Impact Assessment) is required to link to the outcomes of the Council's Heritage Impact Assessment prepared for the site [ED016] • Requirement 8 (Field layout) is necessary and links to the recommendations contained in the Heritage Impact Assessment prepared for the site. • Requirement 9 (Site contributions) recognises that the site should provide contributions to local schools [CD12, 161] and health facilities [CD12,162] in line with the Infrastructure Delivery Plan.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes, the indicative yield is stated in policy [CD01, pg. 116] and derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The site falls in Value Area 1 in the viability assessment [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage.</p>

	The site is supported by a Statement of Common Ground with the site promotor [EX/NBC/04 Appendix 3, pg. 96-100] that indicates that the site is deliverable in the timescales set out in the Housing Trajectory [EX/NBC/04, Appendix 2].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities, alongside open space. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 96-100] agrees that the site is deliverable. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from the policy. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 33 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 & CD15a]. No modifications are proposed by the Council to Policy AB15. The policy as drafted in the Local Plan [CD01] is considered sound.

CT1 Land at Red Street and High Carr Farm	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered fully in the site selection process, evidenced in the site selection report [ED029, Appendix 2, pg. 162]. The site selection process identified matters in terms of access, design, land contamination and coal mining legacy. The policy has considered these impacts in terms of the need to provide for an appropriate design for the site given its scale alongside the provision of a local centre [Criteria 4]. Given the historical uses of the site, a land contamination, noise and coal mining assessment is also required on the site [Criteria 8,9 and 10]</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy CT1 [CD01, pg. 119] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): this is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 &3 (Access) confirms the access arrangements for the site by a couple of means of access. It also confirms the need for speed reduction measures to facilitate safe access into the site. • Requirement 4 (Masterplan) asks the site to provide for a masterplan and design code for the site that considers matters including connectivity to local footpaths and sustainable travel links, boundary treatments with the existing Green Belt and the sites landscape and location as a transition between the urban and rural environment. It also confirms the need for a local centre on the site to meet local retail needs. • Requirement 5 (Land Contamination Assessment) recognises the historical uses on the site. • Requirement 6 (Coal Mining Risk Assessment) recognises the historical uses on the site. • Requirement 7 (Flood Risk) notes that a sequential approach to flood risk in the site • Requirement 8 (Sewers) notes the location of sewer infrastructure in and around the site. • Requirement 9 (Noise Assessment) recognises the proximity of the site to surrounding farm and industrial operations. • Requirement 10 (Odour Assessment) recognises the proximity of the site to surrounding farm and industrial operations. • Requirement 11 (Site Contributions) recognises that the site should provide contributions to local schools [CD12, 161] and health facilities [CD12,162] in line with the Infrastructure Delivery Plan. This includes contributions towards the expansion of St Chads CE VC Primary School and Chesterton Community College.

c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes, the indicative yield is stated in policy [CD01, pg. 119] and derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The site falls in Value Area 1 in the viability assessment [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage. The site is supported by a Statement of Common Ground with the site promotor [EX/NBC/04 Appendix 3, pg. 119-124] that indicates that the site is deliverable with an anticipated 230 dwellings being delivered in the first five years of the adoption of the Local Plan in the timescales set out in the Housing Trajectory [EX/NBC/04, Appendix 2].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities, alongside open space. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 119-124] agrees that the site is deliverable. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from the policy. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 33 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 & CD15a]. Document CD15a notes that a number of modifications are proposed to the site policy MOD086 & MOD087 to make appropriate reference to the need for public transport provision and the need for a utilities masterplan for the site. The policy as proposed to be modified in the submission Local Plan [CD01] is considered sound.

CH13 Castletown Grange	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Site constraints have been considered in the site selection process, evidenced in the site selection report [ED029, Appendix 2, pg. 152] in terms access, flood risk and other matters. The policy has considered these impacts in terms of the need to provide for a sequential approach to flood risk on the site. Site access arrangements are also confirmed. The site is a brownfield site, and the allocation supports the rationalisation of the site.
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy CT1 [CD01, pg. 121] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): this is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Rationalisation) seeks to ensure that the demolition of units onsite is minimised to reduce the impacts of carbon. • Requirement 3 (Access) this requirement confirms the access arrangements into the site, via Ronaldsway Drive • Requirement 4 (Flood Risk) notes the importance of taking account of surface water flooding on the site. • Requirement 5 (Tree Coverage) to support the retention and integration of existing trees on site. • Requirement 6 (Contributions) seeks to provide for contributions towards the capacity of local schools
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes, the indicative yield is stated in policy [CD01, pg. 121] and derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The site falls in Value Area 1 in the viability assessment [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities, alongside open space. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.

e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 & CD15a]. MOD139 proposes a modification to the site policy which restates a need for a site-specific flood risk assessment as an outcome of the agreed statement of common ground with the Environment Agency.

CH14 Maryhill Day Centre	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered fully in the site selection process, evidenced in the site selection report [ED029, appendix 2, pg. 154] which identified amenity considerations regarding potential noise and traffic impacts from Lymedale Cross Industrial Estate [Appendix 2, pg. 154]. The policy has appropriately considered these impacts with criterion 3 of the policy requiring a noise impact assessment and mitigation strategy, and criterion 5 requiring odour and lighting assessments and mitigation strategies in relation to Lymedale Industrial Estate [CD01, pg. 118] to ensure necessary residential amenity is realised on this brownfield site.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy CH14 [CD01, pg. 118] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Wilmot Drive): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Noise Impact Assessment): This is clearly worded and justified by the site's proximity to Lymedale Cross Industrial Estate [ED029, pg. 154]. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 4 (retaining and integrating existing trees into development). It is effective in ensuring compliance with Policy SE8. • Requirement 5 (odour and lighting assessment): This is clear and justified by the site's proximity to Lymedale Cross Industrial Estate [ED029, pg. 154]. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 6 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.3, pg. 162], which identifies needs for education and health facilities arising from cumulative development in Newcastle-under-Lyme Strategic Centre. It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. <p>Additionally, a signed Statement of Common Ground between the promoter (Staffordshire County Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy CH14 being appropriate and justified [Housing Land Paper and Trajectory, EX/NBC/04, pg. 118].</p>

<p>c) Have the indicative yield, development mix and viability considerations been adequately addressed?</p>	<p>Yes. The indicative yield of 30 dwellings is explicitly stated in Policy CH14 [CD01, pg. 118]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Viability considerations have been addressed through the Local Plan Viability Assessment [ED004]. Site CH14 falls within Value Area 1 and aligns most closely with small brownfield site typologies (e.g., Typology 3 [ED004, Table 8.1]. The signed Statement of Common Ground is indication that viability has been adequately addressed. A site-specific assessment would be required at the planning application stage.</p>
<p>d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?</p>	<p>Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>
<p>e) Is there evidence that the development of the allocation is viable and developable during the plan period?</p>	<p>Viability is addressed in point (c) above; with the signed Statement of Common Ground noting that the site is deliverable in the first five years of the Local Plan once adopted. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 118] agrees delivery in 2029/30. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.</p>
<p>f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?</p>	<p>The Council does not consider there to be any significant omissions from Policy CH14. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 30 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15]. No modifications are proposed by the Council to Policy CH14. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>

KG6 William Road, Kidsgrove	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Site constraints have been considered in the site selection process, evidenced in the Site Selection Report [ED029, Appendix 2, pg. 200], which identified that the site lies in a coal authority high risk area. The policy has appropriately considered these impacts with criterion 4 of the policy requiring a coal mining risk assessment and mitigation strategy in relation to the area of former mining activity (Local Plan, CD01, page 124).
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy KG6 [CD01, pg. 124] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via William Road and Warwick Close): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Sequential approach to flood risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 4 (Coal mining/contamination assessment): This is clear and justified by the site's history and location within an area known for former mining activity [ED029, pg. 200]. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2. • Requirement 6 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.3, pg. 162] which identifies needs for education and health facilities arising from cumulative development in Newcastle-under-Lyme Strategic Centre. It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 6 dwellings is explicitly stated in Policy KG6 [CD01, pg. 124], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. The site would not have to provide for affordable housing as it does not meet the threshold of ten dwellings in Policy HOU1 (Affordable Housing).

	Viability considerations have been addressed through the Local Plan Viability Assessment [ED004]. Site KG6 falls within Value Area 1 and aligns most closely with small brownfield site typologies (e.g., Typology 3) [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]; The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site KG6 was identified as suitable, achievable, and available (subject to addressing constraints) as reflected in the Council's housing trajectory [EX/NBC/04, Appendix 2] There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy KG6. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 6 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy KG6. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

KL13 Keele Science Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Yes. The site selection process undertaken by the Council, detailed in the Site Selection Report [ED029, pg. 204-205], identifies the key constraints associated with the site and this understanding has been enhanced through the completion of relevant studies including the Strategic Flood Risk Assessment [ED013] and Strategic Transport Assessment [ED011]. Any identified constraints have been appropriately considered through the requirements set out within Policy KL13 itself [CD01, pg. 128-130]. The site also formed part of the saved policies (2011 – Policy E8) of the 2003 Local Plan.
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes. The requirements set out in Policy KL13 [CD01, pg. 128-130] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. The site will be subject to comprehensive master planning that will also incorporate the adjoining site 'Policy KL15 Land South of A525 Keele'. Master planning and infrastructure provision will also relate to site allocation Policy SP11 Lyme Park to the north of Keele Road. • Requirement 2 (access) confirms the expected access arrangement into the site, via Keele Road and University Way. • Requirement 3 (Bus service) to enhance bus penetration into the site and the connectivity between sites. • Requirement 4 (Landscape led development) to reflect the undulating topography and areas of higher landscape sensitivity. • Requirement 5 (Link Road provision) will facilitate road and walking/cycling links from the A53 Whitmore Road through site allocation TB19 Land South of Newcastle Golf Club and continuing to the A525 Keele Road. The master planning for KL13 will consider the alignment of a potential link road. It will also prospectively enable the delivery of a joined up public transport system linking Keele University and Local Plan site allocations TB19, KL13, KL15 and SP11. • Requirement 6 (Heritage Impact Assessment) serves to examine & ensure that the development responds sensitively to the significant heritage assets in close proximity, with due regard to ED016 (Appendix A5 – KL13)

	<ul style="list-style-type: none"> • Requirement 7 (Hedgerows) tie with the comments to requirement 4 and the desire for screening of development • Requirement 8 (Landscape buffer) owing to the character and approach of Keele Hall Registered Park & Garden • Requirement 9 (Flood Risk) to sequentially steer development from sources of flooding, with a limited part of the site affected by surface water flooding [ED013 & accompanying maps]. • Requirement 10 (Ecological buffers) protects assets found both adjacent and in close proximity to KL13, such as Flagstaff Plantation Ancient Woodland • Requirement 11 (Maintaining the pattern of enclosure) aligns with previously stated assertions for requirements including 4, 7, 8 and 10. • Requirement 12 (Contaminated Land) to address any uncertainty as to the impact of historic land uses. • Requirement 13 (Development Standards) recognises the exemplar quality of the buildings created to date and the desire for this to be continued both in design & sustainability terms and end user attractiveness. • Requirement 13 (Enhanced public rights of Way and Green Infrastructure Network) will serve to improve links & integration with the wider University Corridor network and a co-ordinate the approach with sites KL15, SP11 and TB19 <p>Requirement 14 (Financial Contributions) to mitigate the impacts of the development (including the residential element).</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>The yield of 11 hectares of employment land and 220 units of student accommodation are clearly stated. The constraints identified through the Site Selection Report [ED029, pg. 204-205] and Strategic Housing and Employment Land Availability Assessment [ED006] have been appropriately considered through the requirements set out within Policy KL13 itself [CD01, pg. 119-121]. The site also extends from the long-established Keele University Campus, with several schools and research buildings already operational, with a hotel also opened in recent years as part of earlier phases of development.</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The Infrastructure Delivery Plan (IDP) [CD16 Appendix A] identifies the prospective role that KL13 could play in yielding developer contributions for transport, health and wellbeing, green infrastructure, utilities and community facilities, as part of the cumulative development in the Keele University Corridor (& elsewhere). The IDP also outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements and Policy IN1. The IDP is based on engagement with infrastructure providers (see</p>

	CD16 Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and any required contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	There is a signed statement of common ground with the site promotor [EX/NBC/04, pg. 127-131] which confirms that the site is developable within the Plan period, up to 2040, and there are no legal or ownership constraints and that the site promotor considers the site to be deliverable.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	A modification has been proposed on the site (MOD155) to ensure consistency between sites KL13, KL15 and TB19 when making reference to the link road through the respective sites. it is considered that through the uses that may comprise development on the site (i.e. employment uses that comprise of business space for science-based companies, academic buildings and employment uses directly related to the University's core functions, plus associated ancillary uses), Policy KL13 is sufficiently flexible.

KL15 Land South of A525 Keele	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Yes. The site selection process undertaken by the Council, detailed in the Site Selection Report [ED029, pg. 206-208], identifies the key constraints associated with the site and this understanding has been enhanced through the completion of relevant studies including the Green Belt Review [ED008, pg. D-27 to D-28), Strategic Flood Risk Assessment [ED013] and Strategic Transport Assessment [ED011]. Any identified constraints have been appropriately considered through the requirements set out within Policy KL15 itself [CD01, pg. 121-123].
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes. The requirements set out in Policy KL15 [CD01, pg. 128-130] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. The site will be subject to comprehensive master planning that will also incorporate the adjoining site, KL13. Master planning and infrastructure provision will also relate to site allocation Policy SP11 Lyme Park to the north of Keele Road. • Requirement 2 (access) confirms the expected access arrangement into the site, via Keele Road and University Avenue. • Requirement 3 (Bus service) to enhance bus penetration into the site and the connectivity between sites. • Requirement 4 (Landscape led development) to reflect the undulating topography and areas of higher landscape sensitivity. • Requirement 5 (Link Road provision) will facilitate road and walking/cycling links from the A53 Whitmore Road through site allocation TB19 Land South of Newcastle Golf Club and continuing to the A525 Keele Road. The master planning for KL15 will consider the alignment of a potential link road. It will also prospectively enable the delivery of a joined up public transport system linking Keele University and Local Plan site allocations TB19, KL13, KL15 and SP11. • Requirement 6 (Active travel corridor) to provide cycle connectivity to the town centre. • Requirement 7 (Heritage Impact Assessment) serves to examine & ensure that the development responds sensitively to the significant heritage assets in close proximity, with due regard to ED016 (Appendix A6 – KL15) • Requirement 8 (Archaeology) reflects the heritage evidence ED016.

	<ul style="list-style-type: none"> • Requirement 9 (Flood Risk) to sequentially steer development from sources of flooding, with a limited part of the site affected by surface water flooding [ED013 & accompanying maps]. • Requirement 10 (Ecological buffers) protects assets found both adjacent and in close proximity to KL15, such as Flagstaff Plantation Ancient Woodland • Requirement 11 (Maintaining enclosure & landscape buffer) aligns with previously stated assertions for requirements including 4 and 10. • Requirement 12 (Contaminated Land) to address any uncertainty as to the impact of historic land uses and longstanding industrial legacy. • Requirement 13 (Development Standards) recognises the exemplar quality of the buildings created to date on the adjacent KL13 and the desire for this to be continued both in design & sustainability terms and end user attractiveness. • Requirement 14 (Enhanced public rights of Way and Green Infrastructure Network) will serve to improve links & integration with the wider University Corridor network and a co-ordinate the approach with sites KL13, SP11 and TB19 • Requirement 15 (Financial Contributions) to mitigate the impacts of the development (including the residential element).
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>The site is allocated for up to 13 hectares of employment land and 220 units of student accommodation. The constraints identified through the Site Selection Report [ED029, pg. 206-208] and Strategic Housing and Employment Land Availability Assessment [ED006] have been appropriately considered through the requirements set out within Policy KL15 itself [CD01, pg. 121-123]. The Sustainability Appraisal [CD03] and the Habitats Regulations Assessment [CD05 & EX/NBC/03b], allied to the Strategic Transport Assessment [ED011, pg. 78] and Site-specific Landscape and Visual Appraisal [ED017, pg59-61] are also noteworthy, given that KL15 forms a strategic employment site. The site also forms a natural extension from the long-established Keele University Campus, the Science & Innovation Park (KL13) and borders the Low Carbon Energy Generation Park to the south.</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The Infrastructure Delivery Plan (IDP) [CD16 Appendix A] identifies the prospective role that KL15 could play in yielding developer contributions for transport, health and wellbeing, green infrastructure, utilities and community facilities, as part of the cumulative development in the Keele University Corridor (& elsewhere). The IDP also outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements and Policy IN1. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by</p>

	robust evidence. Their deliverability is linked to the development proceeding and any required contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	There is a signed statement of common ground with the site promotor [EX/NBC/04, pg. 127-131] which confirms that the site is developable within the Plan period, up to 2040, and there are no legal or ownership constraints and that the site promotor considers the site to be deliverable.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	A modification has been proposed on the site (MOD155) to ensure consistency between sites KL13, KL15 and TB19 when making reference to the link road through the respective sites. It is considered that through the uses that may comprise development on the site (i.e. employment uses that comprise of business space for science-based companies, academic buildings and employment uses directly related to the University's core functions, plus associated ancillary uses), Policy KL15 is sufficiently flexible.

KS3 Land at Blackbank Road, Knutton	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered fully in the site selection process, evidenced in the site selection report [ED029, Appendix 2, pg. 229] which identified that the site lies marginally in a coal authority high risk area. The policy has appropriately considered these impacts with criterion 4 of the policy requiring a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to the area of former mining activity (CD01, page 125). Policy KS3 has also considered the immediate urban area which comprises of industrial and quarry operations in the locality with submission of a noise and odour assessment in criteria 8 and 9 of the policy. Additionally, Lymedale Business Park (SBI) is located within 200m, and any impacts will be mitigated against harm.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy KS3 [CD01, pg. 125] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Development reflecting master planning proposals): The requirement is clear that the develop must reflect master planning proposals to the wider Knutton area and any site-specific implications. • Requirement 3 (Access via B5367, High Street) This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 4 (Development is landscape-led) This is in relation to the sites location which abuts the Green Belt on its western boundary. This is in line with PSD5, of improving the environmental quality of remaining Green Belt. • Requirement 5 (Sequential approach to flood risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 6 (mitigation of any impacts to SBI) This recognises the site as an area of high biodiversity, with its recognition and mitigation of impacts in line with SE7 and SE8. • Requirement 7 (Coal mining/contamination assessment): This is clear and justified by the site's history and location within an area known for former mining activity [ED029, pg. 230]. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2.

	<ul style="list-style-type: none"> • Requirement 8 (Noise Impact Assessment) This is clearly worded and justified by the site's proximity to nearby quarry operations. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 9 (Odour Assessment) This is clearly worded and justified by the site's proximity to nearby quarry operations. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 10 (Preservation of existing Public Right of Way) Newcastle 61 adjoins this site. Policy KS3 is clear and justified in preservation of this right of way in line with NPPF paragraph 105 and policy IN4 in the Local Plan. • Requirement 11 (Protection of mature trees) The protection of mature trees including their root network is effective in ensuring aesthetic, environmental, economic and social benefits of mature trees, in accordance with SE11. • Requirement 12 (Consideration of alternative sports provision) The sports pitch identified in the Playing Pitch Strategy 2020 (ED012) within the site has been deemed surplus to requirement due to the poor quality of pitch. • Requirement 13 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A1, ref H5, page 163, which identifies needs for health facilities arising from cumulative development in the Newcastle-under-Lyme Strategic Centre. It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. • Requirement 8 (Contributions to Highways around A525 to Whitmore Road): to accommodate cumulative development growth in the area. It is effective in ensuring development mitigates its impact on the highway network in line with Policy IN1 and IN2. <p>Additionally, a signed Statement of Common Ground between the promoter (Staffordshire County Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy KS3 being appropriate and justified [EX/NBC/04, pg. 140].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 150 dwellings is explicitly stated in Policy KS3 [CD01, pg. 125], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need.</p> <p>Viability considerations have been addressed through the Local Plan Viability Assessment [ED004]. The assessment indicates that viability for such greenfield sites in this location is viable [ED004, Table 8.1]. Additionally, a signed statement of common ground with the developer</p>

	indicates that viability has been adequately addressed [EX/NBC/04, pg. 140]. A site-specific assessment would be required at the planning application stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities as well as highways improvements to facilitate the distribution of traffic from the A525 to Whitmore Road. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site KS3 was identified as suitable, achievable, and available (subject to addressing constraints). The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 140] agrees delivery in 2027/28. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy KS3, recommends adding a criterion. Regarding submission of a mineral safeguarding assessment into the policy. Upon addition of this criterion, the Council considers this policy to be robust and sound.

KS11 Knutton Community Centre, High Street, Knutton	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered in the site selection process, evidenced in the site selection report [ED029, Appendix 2, pg. 221] which identified that the site lies marginally in a coal authority high risk area. The policy has appropriately considered these impacts with criterion 4 of the policy requiring a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to the area of former mining activity [CD01, page 126-127). Criterion 4 also requires a mineral safeguarding assessment as the site selection process identified a mineral safeguard area on site.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy KS11 [CD01, pg. 126-127] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Lower Milehouse Lane) This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Development reflecting master planning proposals): The requirement is clear that the develop must reflect master planning proposals to the wider Knutton area and any site-specific implications. • Requirement 4 (Coal mining /contamination assessment): This is clear and justified by the site being a coal authority high risk area [ED029, pg. 221]. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2. • Requirement 5 (Protection of mature trees) The protection of mature trees is effective in ensuring aesthetic, environmental, economic and social benefits of mature trees, in accordance with SE11. Amenity green space provision replacement is in line with SE14 to enhance public spaces through high quality design of green space. • Requirement 6 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3, pg. 161] It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire Housing) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy KS11 being appropriate and justified [EX/NBC/04, pg. 135].</p>

<p>c) Have the indicative yield, development mix and viability considerations been adequately addressed?</p>	<p>Yes. The indicative yield of 9 dwellings is explicitly stated in Policy KS11 [CD01, pg. 126], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site KS11 falls within Value Area 1 and aligns most closely with small brownfield site typologies (e.g., Typology 3) [ED004, Table 8.1]. However, a signed Statement of Common Ground indicates that the site is deliverable. A site-specific assessment would be required at the planning application stage.</p>
<p>d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?</p>	<p>Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>
<p>e) Is there evidence that the development of the allocation is viable and developable during the plan period?</p>	<p>Viability is addressed in point (c) above; the Viability Assessment [ED004] and signed Statement of Common Ground. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site KS11 was identified as suitable achievable and available (subject to addressing constraints) as reflected in the Council's housing trajectory [CD01, Appendix 6]. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 135] agrees delivery in 2025/26. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements. The site has planning permission for 21 dwellings [24/00023/FUL].</p>
<p>f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?</p>	<p>The Council does not consider there to be any significant omissions from Policy KS11. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 9 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy KS11. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>

KS17, Knutton Recreation Centre, Knutton Lane	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Site constraints have been considered in the site selection process, evidenced in the Site Selection Report [ED029, Appendix 2, page 223]. The policy has appropriately considered impacts of land contamination due to former mining in the area with criterion 7 of the policy requiring a land contamination assessment and mitigation strategy [CD01, page 127]. Criterion 6 also requires a noise impact assessment and mitigation strategy in relation to nearly commercial uses.
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy KS17 [CD01, pg. 127] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (High Street and Downham Road) This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Development reflecting master planning proposals): The requirement is clear that the develop must reflect master planning proposals to the wider Knutton area and any site-specific implications. • Requirement 4 (sequential approach to flood risk): This standard requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 5 (Preservation of existing Public Right of Way): Newcastle 96 is on site. Policy KS17 is clear and justified in preservation of this right of way in line with NPPF paragraph 105 and policy IN4 in the Local Plan. • Requirement 6 (Noise Impact Assessment): This is clearly worded and justified by the site's proximity to nearby quarry operations. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 7 (Land Contamination Assessment) This requirement is clear and justified as a standard precaution for brownfield sites, particularly former commercial premises, ensuring the land is suitable for residential use (NPPF para 189, Policy SE2). It is effective in managing potential risks. • Requirement 8 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A1, ref H5, page 163, which identifies needs for health facilities arising from cumulative development in the Newcastle-under-Lyme

	<p>Strategic Centre. It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5.</p> <ul style="list-style-type: none"> Requirement 9 (Contributions Highways around A525 to Whitmore Road) <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire Housing) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy KS17 are appropriate and justified [EX/NBC/04, pg. 135].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 55 dwellings is explicitly stated in Policy KS17 [CD01, pg. 127], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site KS17 falls within Value Area 1 [ED004, Table 8.1]. However, a signed Statement of Common Ground by developer indicates that the site is deliverable. A site-specific assessment would be required at the planning application stage. The site has planning permission for 54 dwellings [23/00771/FUL].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities as well as highway contributions to facilitate the distribution of traffic from A525 to Whitmore Road. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Viability is addressed in point (c) above; the Viability Assessment [ED004] and signed Statement of Common Ground. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site KS17 was identified as suitable, achievable, and available (subject to addressing constraints) as reflected in the Council's housing trajectory [CD01, Appendix 6]. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 135] agrees delivery of 24 dwellings in 2025/26 and 30 dwellings in 2026/27. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements. Site KS17 has been granted planning permission on 30/01/2025, under reference 23/00771/FUL.</p>

<p>f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?</p>	<p>The Council does not consider there to be any significant omissions from Policy KS17 The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the allocation of 55 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy KS17. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>
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KS18 Land North of Lower Milehouse Lane, Knutton	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered in the site selection process, evidenced in the site selection report [ED029, appendix 2, page 226] which identified that the site lies marginally in a coal authority high risk area. The policy has appropriately considered these impacts with criterion 5 of the policy requiring a coal mining risk assessment, land contamination assessment and mitigation strategy in relation to the area of former mining activity (CD01, page 127-128). Criterion 5 also requires a mineral safeguarding assessment as the site selection process identified a mineral safeguard area on site. Policy KS18 has also considered the impact of the loss of a community car park from development by means of a transport assessment set out in criterion 4.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy KS18 [CD01, pg. 127-128] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (High Street B5367) This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Development reflecting master planning proposals): The requirement is clear that the develop must reflect master planning proposals to the wider Knutton area and any site-specific implications. • Requirement 4 (Transport Assessment). This is clearly set out in the policy to mitigate the risk of overspill of vehicles parking in the street from the demolition of car parking garages. • Requirement 5 (Coal Mining Risk Assessment) This is clear and justified by the site's history and location within an area known for former mining activity [ED029, pg. 226]. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2. • Requirement 6 (Noise Impact Assessment): This is clearly worded and justified by the site's proximity to nearby uses. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 7 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16] is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5.

	<ul style="list-style-type: none"> Requirement 8 (Demolition of car park garages) This is clear and justified in that it will clear the space for the development of 10 dwellings. Requirement 9 (Retention of trees): This is justified as trees not only provide biodiversity value (SE8) but also, as stated in SE11 should be retained where possible given the aesthetic, environmental, economic and social benefits they provide. Requirement 10 (Land Contamination Assessment) This requirement is clear and justified as a standard precaution for brownfield sites, particularly former commercial premises, ensuring the land is suitable for residential use (NPPF para 189, Policy SE2). It is effective in managing potential risks. Requirement 11 (Same as Requirement 7) <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire Housing) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy KS18 being appropriate and justified [EX/NBC/04, pg. 135].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 10 dwellings is explicitly stated in Policy KS18 [CD01, pg. 127], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site KS18 falls within Value Area 1 [ED004, Table 8.1] However, a signed Statement of Common Ground with developer indicates the site is deliverable. A site-specific assessment would be required at the planning application stage.</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Viability is addressed in point (c) above; the Viability Assessment [ED004] and SOCG. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site KS18 was identified as suitable, achievable, and available (subject to addressing constraints) as reflected in the Council's housing trajectory [CD01, Appendix 6]. The agreed Statement of Common Ground with the Council and</p>

	Staffordshire County Council is contained in the Housing Supply and Trajectory paper [EX/NBC/04 Appendix 3, pg. 135] agrees delivery in 2029/30. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy KS18. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 10 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy KS18. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

KS19 Land at Knutton Lane	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Any site constraints have been considered fully in the site selection process, evidenced in ED029.
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy KS19 [CD01, pg. 128-129] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire Housing) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy KS17 are appropriate and justified [EX/NBC/04, pg. 135].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 5 dwellings is explicitly stated in Policy KS18 [CD01, pg. 128], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site KS19 falls within Value Area 1 and the assessment indicates that viability for such sites in this location is marginal [ED004, Table 8.1] however a signed SOCG indicates the site is deliverable. A site-specific assessment would be required at the planning application stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	There are no specific infrastructure requirements for this site. The delivery of the site would be consistent with the requirements of policy SA1 (General Requirements) in the Local Plan.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site KS19 was identified as suitable, achievable, and available. The agreed Statement of Common Ground with the Council and Staffordshire County Council contained in EX/NBC/04 [Appendix 3, pg. 135] agrees delivery in 2028/29. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are	The Council does not consider there to be any significant omissions from Policy KS19. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 5

the main modifications suggested to the Policy necessary to make the plan sound?	dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy KS19. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.
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LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered in the site selection process, evidenced in the site selection report [ED029, Appendix 2, page 249] which identified that the site lies within proximity to White House Farm, a grade II listed building. The policy has appropriately considered these impacts with criterion 3 and 5 of the policy requiring a heritage impact assessment and an appropriate landscape buffer (CD01, page 129). Policy LW53 has also considered land contamination from Tagedale Quarry with a land contamination assessment (criterion 7), using a noise impact assessment (criterion 8) due to Ranworth Lodge Kennels being located nearby and an assessment/mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone (criterion 9).</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy LW53 [CD01, pg. 129] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Mucklestone Wood Lane): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Heritage Impact Assessment): supported by the Council's Heritage Impact Assessment [ED016]. • Requirement 4 (Archaeological recording): This requirement is clear and justified as a precautionary measure standardly applied during the site assessment process [ED029]. It is effective in identifying and managing any potential below-ground heritage assets. • Requirement 5 (Landscape buffer in relation to Grade II listed building): Paragraph 13.136 of the policy justifies an appropriate landscape buffer on the eastern boundary to help preserve and enhance the setting of the heritage assets. The nature and scale this buffer will be informed by the outcomes of the Heritage Impact Assessment and Landscape Assessment. • Requirement 6 (Landscape buffer along western extent of site) is necessary due to the edge of settlement location of the site. • Requirement 7 (Land Contamination Assessment) This requirement is clear and justified as the site is located to the east of the former landfill site at Tagedale Quarry, ensuring the

	<p>land is suitable for residential use (NPPF para 189, Policy SE2). It is effective in managing potential risks.</p> <ul style="list-style-type: none"> • Requirement 8 (Noise Impact Assessment) This is clearly worded and justified by the site's proximity to Ranworth Lodge Kennels [CD01, para 13.137]. It is effective in ensuring compliance with Policy SE1 regarding pollution. • Requirement 9 (Assessment and mitigation to prevent deterioration of SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptor): This site is underlain by a principal aquifer and the SPZ2 Bearstone Groundwater Protection Zone is located to the north of the site and beyond Mucklestone. Therefore, in line with SE5, a comprehensive risk assessment is required. • Requirement 10 (Contributions- Schools/ Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Table A2,] which identifies LW53 as requiring contributions towards Madeley High School Extension. Table A3 identifies needs for health facilities arising from cumulative development in the Rural South (H6). It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. • Requirement 11 (Contributions- Open Space). This is clear and justified by the Infrastructure Delivery Plan [CD16, Table A4, ref GI24] which identifies need for open space provisions arising from the cumulative development in the Rural South. • Requirement 12 (Off site Contributions – Highways and Bus Services): Junction improvements may be required to the Mucklestone Wood Lane / A53 / Gravelly Hill Crossroads Junction. A financial contribution may also be required to support improvements in local bus services due to the impacts of the development. • Requirement 13 (Improvements to bus stop on Mucklestone Wood Lane): Bus stop improvements required due to increased bus use from development. <p>Additionally, a signed Statement of Common Ground between the promoter (Shropshire Homes) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy LW53 being appropriate and justified [EX/NBC/04, pg. 147].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 130 dwellings is explicitly stated in Policy LW53 [CD01, pg. 129-130], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site LW53 falls within Value Area 2 and the assessment indicates that the site is viable [ED004, Table 8.2]. A signed SOCG also indicates that the site is deliverable. A site-specific assessment would be</p>

	required at the planning application stage. The site has outline planning permission for 150 dwellings following a planning appeal on the site [23/00002/OUT].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities, open space, highways, and bus services (off site) and the bus stop at Mucklestone Wood Lane. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site LW53 was identified as suitable for housing, achievable and available. The agreed Statement of Common Ground with the Council and Shropshire Homes contained in EX/NBC/04 [Appendix 3, pg. 146] agrees delivery of 18 dwellings in 2026/27, 30 dwellings in 2027/28, 32 dwellings in 2028/29, 30 dwellings 2029/30, 40 dwellings in 2030-35. The site has outline planning permission for 150 dwellings [23/00002/OUT]. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy LW53. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the allocation of 130 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy LW53. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

MD29 Land North of Bar Hill, Madeley	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Site constraints have been considered in the site selection process, evidenced in the site selection report [ED029, Appendix 2, page 287] which identified that a limited part of the site is affected by surface water flooding, the site lies within proximity to ancient woodland and a conservation area. The policy has appropriately considered these impacts with criterion 6 of the policy requiring a sequential approach to flood risk with appropriate drainage, criterion 7 requiring impacts to Bar Hill Ancient Woodland to be mitigated and criterion 11 requiring a heritage impact assessment (CD01, page 131). Policy MD29 has also considered using a noise impact assessment (criterion 9) due to the A525 and West Coast Mainline being located nearby.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy MD29 [CD01, pg. 131-132] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Bar Hill): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 3 (Improvements to active travel links) The existing pedestrian footbridge over the railway line provides the most direct pedestrian route to the centre of Madeley where facilities and amenities are located and should be improved in line with Policy PSD6 • Requirement 4 (Landscape led) to ensure the layout of development and the design of buildings and structures is appropriate for the setting. • Requirement 5 (Preservation of long-range views) acknowledges the location of the site at the edge of the settlement of Madeley. • Requirement 6 (Drainage) This standard requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk and drainage is appropriately managed. • Requirement 7 (Impacts against Bar Hill Ancient Woodland mitigated) in recognition that this a valuable natural asset. • Requirement 8 (Tree Preservation Orders): Recognition of these orders to protect individual trees and woodlands from felling or damage.

	<ul style="list-style-type: none"> Requirement 9 (Noise Assessment) required in relation to the site's proximity to the A525 and West Coast Mainline. Requirement 10 (Preservation of existing public right of way): This is clear and justified in preservation of this right of way (Madeley 24) in line with NPPF paragraph 105 and policy IN4 in the Local Plan. Requirement 11 (Heritage Impact Assessment) supported by the Council's Heritage Impact Assessment [ED016] to ensure the development responds sensitively to the setting of the Conservation Area and nearby heritage assets. Requirement 12 (Contribution Schools/ Health) This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3], which identifies needs for education and health facilities arising from cumulative development in the Rural Centre is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. <p>Additionally, a signed Statement of Common Ground between the promoter (Lone Star Land Limited) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy MD29 being appropriate and justified [Housing Land Paper and Trajectory, EX/NBC/04, pg. 148]. The site has a resolution to grant outline planning permission for 155 dwellings following planning committee on the 03 December 2024.</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 150 dwellings is explicitly stated in Policy MD29 [CD01, pg. 131], derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site MD29 falls within Value Area 1 and the assessment indicates that the site is viable [ED004, Table 8.1]. A signed SOCG [EX/NBC/04, pg. 148] indicates that the site is deliverable and that there are no insurmountable constraints which would impact upon the delivery of the site.</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1). A signed SOCG [EX/NBC/04, pg. 148] indicates that the site is deliverable. The site has a resolution to grant outline planning permission for 155 dwellings following planning committee on the 03 December 2024 (Ref 23.00979.OUT. This includes a number of Section 106 agreement requirements.</p>

e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The agreed Statement of Common Ground with the Council and Lone Star Land Limited contained in EX/NBC/04 [Appendix 3, pg. 148] agrees delivery of 5 dwellings in 2026/27, 40 dwellings in 2027/28, 40 dwellings in 2028/29, 40 dwellings 2029/30, 30 dwellings in 2030-35. The site has a resolution to grant planning permission for 155 dwellings [23/00979/OUT]. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy MD29, add a new criterion (13) as follows: "A programme of archaeological recording to investigate the nature of and significance of any archaeological remains that survive on the site" to improve the effectiveness of the policy. Upon amending this criterion, the Council considers this policy to be robust and sound.

NC13 Land West of Bullockhouse Road, Harriseahead	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Site constraints have been considered fully in the site selection process, evidenced in the site selection report [ED029, Appendix 2, pg. 305]. The policy has appropriately considered these impacts with criterion 5 of the policy considering impacts of surface water flooding. Criterion 6 considers a coal mining risk assessment and land contamination assessment and mitigation in relation to former mining activity on the site.
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy NC13 [CD01, pg. 137-138] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access) confirms access arrangements via Bullocks House Road. • Requirement 3 (Site Frontage) emphasises the need for the site to provide for an appropriate access / entrance into the site alongside making contributions towards local bus service improvements. • Requirement 4 (landscape) recognises the sites relationship to the existing settlement and the need to provide for a landscape led approach. • Requirement 5 (Flood Risk) notes how a sequential approach should be taken to take account of flood risk from all sources on the site. • Requirement 6 (land assessments) refers to the need for a coal mining risk assessment, land contamination assessment and mitigation strategy in recognition of the former mining activity in the area. • Requirement 7 (PROW) refers to the need for the retention of Public Rights of Way • Requirement 8 (Financial Contributions) supported by the Infrastructure Delivery Plan seeks to secure contributions towards improvements in the capacity of local schools [CD16, pg161] and health facilities [CD16, pg. 164]
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 100 dwellings is explicitly stated in Policy NC13 [CD01, pg. 137-138], derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site NC13 falls within Value Area 2 and the assessment indicates that the site is

	viable [ED004, Table 8.2]. A signed SOCG [EX/NBC/04, pg156-156] also indicates that the site is deliverable and that there are no insurmountable constraints which would impact upon the delivery of the site.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site LW53 was identified as suitable for housing, achievable and available. The agreed Statement of Common Ground with Bloor Homes and the Council contained in EX/NBC/04 [Appendix 3, pg. 153] agrees delivery within the five-year period on the adoption of the Local Plan. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy NC13. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the allocation of 100 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 / CD15a]. No modifications are proposed by the Council to Policy NC13. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

SP2 Cheddar Drive	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Any site constraints have been considered fully in the site selection process, evidenced in the site selection report [ED029, Appendix 2, page 335] which identified that the site lies marginally in a coal authority high risk area. The policy has appropriately considered these impacts with criterion 3 of the policy requiring a coal mining risk assessment in relation to the area of former mining activity (CD01, page 134).
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy SP2 [CD01, pg. 134] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Demolition of 4 dwellings, resulting in a net gain of 8) This is clear and justified in that it will clear the space for the development of net gain 8 dwellings. • Requirement 3 (Access via Cheddar Drive): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 4 (Coal Mining Risk Assessment): This is clear and justified by the site's history and location within an area known for former mining activity [ED029, pg. 335]. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2. • Requirement 5 (Contributions- Schools/ Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3, pg. 161], which identifies needs for education and health facilities arising from cumulative development in Newcastle-under-Lyme Strategic Centre is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire Housing) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy SP2 being appropriate and justified [EX/NBC/04, pg. 164].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of net gain 8 dwellings is explicitly stated in Policy SP2 [CD01, pg. 134], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site SP2 falls within Value Area 1 [ED004, Table 8.21]. A signed SOCG also indicates viability has been

	adequately addressed. A site-specific assessment would be required at the planning application stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site SP2 was identified as suitable, achievable, and available. The agreed Statement of Common Ground with the Council and Aspire Housing contained in EX/NBC/04 [Appendix 3, pg. 164] agrees delivery 2026/27. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy SP2. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 8 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy SP2. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

SP11 Lyme Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process [ED029] identified and assessed the constraints pertinent to site SP11. The corresponding site assessment proforma [ED029, Appendix 2, pg. 327 & 328] details these considerations. Key constraints identified include the site's location within the Green Belt, its impacts on local ecology (Biodiversity Alert Site), flood risk and the Keele Hall Registered Parks and Gardens. The site is in close proximity to farm and industrial uses. There are mineshafts and mature trees present on site. These constraints are addressed through the requirements set out within Policy SP11 [CD01, pg. 138]. Requirements 3,4,9,10,12, and 13 specifically mandate assessments and mitigation relating to landscape buffers, long-range views, heritage assets, archaeology, coal mining/contamination assessments, noise impacts, and flood risk</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy SP11[CD01, pg. 138] are considered clear, justified, and effective.</p> <p>The introduction to the site clearly sets out the anticipated development requirements for the site, supported by appropriate infrastructure. It also confirms anticipated access arrangements into the site. This is supported by Figure 3 (SP11 Site Arrangement) for the site.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (access routes) clearly sets the expectations that connectivity, particularly by non-car means is anticipated between the different parcels of land within the wider allocation. • Requirement 3 & 4 (Heritage) includes requirements for assessments and mitigation measures for heritage sites supported by the Council's Heritage Impact Assessment [ED016]. • Requirement 5 (active routes) for the site to provide for appropriate connectivity by non-car means to adjacent uses. • Requirement 6 (public transport) to ensure that appropriate contributions are provided from the site toward local bus infrastructure and the provision of routes to residents to allow them to access public transport. • Requirement 7 (design) given the sites scale and the need for ecological buffers in the site, it is necessary to provide for a wider comprehensive masterplan and design code for the site. • Requirement 8 (flood risk) provides for a sequential approach within the site to flood risk to mitigate and minimise any impacts for flood risk. • Requirement 9 (noise mitigation) the preparation and implementation of a noise mitigation strategy given sensitive uses around the site.

	<ul style="list-style-type: none"> • Requirement 10 (Odour) provides for an assessment that takes account of adjacent industrial uses. • Requirement 11 (open space) seeks to provide for formal and informal open space through the site. • Requirement 12 (land contamination assessment / mitigation strategy) which is identified as required due to the previous importing of materials into the site. • Requirement 13 (Coal Mining Assessment) is required given historical uses present on the site. • Requirements 14 (landscape buffers), buffers are asked to be retained on site to recognise its Green Belt location and the adjacent Keele Hall Registered Park and Garden • Requirement 15 and 16 (financial contributions) recognise that, following the completion of the Strategic Transport Assessment [ED011] and Infrastructure Delivery Plan [CD16, pg. 159, 161, 163, 172] that contributions are required to infrastructure to support the site. It is recognised that the site provides for a primary school and a health centre.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 900 dwellings is explicitly stated in Policy SP11 [CD01, pg. 138], derived from the SHELAA assessment [ED006a] and wider masterplanning that has been undertaken by the site promotor. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. There is a signed statement of common ground for the site [EX/NBC/04, Appendix 3, 157-160] that indicates that the site is capable of delivery over the Plan period. Viability considerations have been addressed through the Local Plan Viability Assessment [ED004].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The key infrastructure requirements have been identified on the site. The site provides for a primary school, health centre and local centre. The need for this infrastructure is evidenced in the Infrastructure Delivery Plan (IDP) [CD16, pg. 159, 161, 163, 172]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements or through direct provision, as stipulated in Policy SP11 [CD01, pg. 138] and Policy IN1. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>

e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004] and SOCG. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site SP11 was identified as suitable and available (subject to addressing constraints) as reflected in the Council's housing trajectory [CD01, Appendix 6]. The agreed Statement of Common Ground with the Borough Council planning and assets team contained in EX/NBC/04 [Appendix 3, pg. 157] suggests that delivery will start on site by 208/29. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. There are modifications proposed to the policy MOD093 & MOD094 which propose modifications to the sites position and proximity to Walley's Quarry Landfill site, confirming that parcel 4 on Park Road should not be occupied until the importation of non-hazardous waste to Walley's Quarry landfill ceases.

SP22 Former Playground off Ash Grove	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	Site constraints have been considered in the site selection process, evidenced in the site selection report [ED029, Appendix 2, page 336] which identified that the site lies marginally in a coal authority high risk area (Appendix 2, page 336). The policy has appropriately considered these impacts with criterion 3 of the policy requiring a coal mining risk assessment in relation to the area of former mining activity (Local Plan, CD01, page 138).
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy SP22 [CD01, pg. 138] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Demolition of 14 dwellings, resulting in a net gain of 36): There are existing dwelling units on this brownfield site which would be demolished to result in the net gain of 36. • Requirement 3 (Access via St Lukes Close): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 4 (Heritage Impact Assessment) supported by the Council's Heritage Impact Assessment [ED016] to ensure the development responds sensitively to the setting of Silverdale Conservation Area and nearby heritage assets. • Requirement 5 (Design to not detract from the historic views): This is to ensure the setting of St Luke's Church, the conservation area and 19th Century terraces along Sneyd terrace are not affected by the development. • Requirement 6 (Archaeological Assessment) This requirement is clear and justified as a precautionary measure. It is effective in identifying and managing any potential below-ground heritage asset. • Requirement 7 (Sequential approach to flood risk) This standard requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 8 (Land Contamination Assessment): This requirement is clear and justified, ensuring the land is suitable for residential use (NPPF para 189, Policy SE2). It is effective in managing potential risks.

	<ul style="list-style-type: none"> Requirement 9 (Contributions- Schools/ Health) This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3, pg. 161], which identifies needs for education and health facilities arising from cumulative development in Newcastle-under-Lyme Strategic Centre is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire represented by Knights) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy SP22 being appropriate and justified [EX/NBC/04, pg. 169]. Planning permission has also been granted on 28 January 2025 (24/00231/FUL).</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of net gain 36 dwellings is explicitly stated in Policy SP22 [CD01, pg. 138], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need. Site SP22 falls within Value Area 1 [ED004, Table 8.1]. A signed SOCG also indicates viability has been adequately addressed. A site-specific assessment would be required at the planning application stage. Planning permission has also been granted on 28 January 2025 (24/00231/FUL).</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Viability is addressed in point (c) above; the Viability Assessment [ED004]. The site is considered developable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site SP22 was identified as suitable achievable, and available. The agreed Statement of Common Ground with the Council and Aspire Housing contained in EX/NBC/04 [Appendix 3, pg. 169] agrees delivery of 42 sites in 2028/29. There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements. Planning permission has also been granted on 28 January 2025 (24/00231/FUL).</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	<p>The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy SP22, add additional text “A site-specific Flood Risk Assessment should be prepared for the site alongside a Surface Water Drainage Strategy which includes a SuDs maintenance and management plan” to ensure consistency with</p>

	the outcomes of the Level 2 Strategic Flood Risk Assessment. Upon amending this criterion, the Council considers this policy to be robust and sound.
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SP23 Land at Cemetery Road / Park Road	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site SP23 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 338] provides a summary.</p> <p>Key constraints identified are the site's location within the Green Belt, proximity to Walley's Quarry, proximity to heritage assets. These constraints are directly addressed through requirements 3, 8, and 11 of Policy SP23 [CD01, pg. 138-139], which is for no dwellings to be occupied before Walley's Quarry ceases operations, heritage impact assessment and heritage design requirements as well as a land contamination assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy SP23 [CD01, pg. 138-139] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Establishment of Open Space) seeks to provide for formal and informal open space through the site. • Requirement 3 (No dwellings occupied before cessation of the disposal of non-hazardous waste at Walley's Quarry): This is to mitigate against potential polluting impacts from the landfill site. • Requirement 4 (Access via Cemetery Road) This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 5 (offsite improvements to enhance cycle and pedestrian connectivity) required given that the site is in close proximity to Public Rights of Way (Silverdale 23) • Requirement 6 (Cycle and pedestrian routes from Cemetery Road to A525) - The Infrastructure Delivery Plan [CD16, Appendix A1, ref T5] identifies a need for active travel measures by means of contribution towards complete, coordinated walking/cycling corridor between Keele University • Requirement 7 (Masterplanning to consider linkage to SP11 (4)) to provide a further access point, ensure coordination across the two sites and appropriate boundary treatment with the Green Belt. • Requirement 8 (Heritage Impact Assessment) Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment.

	<ul style="list-style-type: none"> • Requirement 9 (Archaeological Recording): This requirement is effective in identifying and managing any potential below-ground heritage assets. • Requirement 10 (Retaining existing trees and hedgerows) It is effective in ensuring compliance with Policy SE8. • Requirement 11 (Land Contamination Assessment) This requirement is clear and justified as the site is located close to Walley's Quarry, ensuring the land is suitable for residential use (NPPF para 189, Policy SE2). It is effective in managing potential risks. • Requirement 12 (Noise Assessment) in relation to Cemetery Road and adjacent industrial uses. • Requirement 13 (Sequential Approach to Flood Risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 14 (Contributions- Schools/ Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.3, A2] which identifies needs for education and health facilities arising from cumulative development in Newcastle-under-Lyme Strategic Centre is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. • Requirement 15 (Contributions to facilitate distribution of traffic from A525 to Whitmore Road) [CD016, T13, pg. 159] to accommodate cumulative development growth in the area. It is effective in ensuring development mitigates its impact on the highway network in line with Policy IN1 and IN2. <p>Additionally, a signed Statement of Common Ground between the promoter (Richborough represented by Knights) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy SP23 being appropriate and justified [EX/NBC/04, pg. 174].</p>
<p>c) Have the indicative yield, development mix and viability considerations been adequately addressed?</p>	<p>Yes. The indicative yield of 200 dwellings is stated in Policy SP23 [CD01, pg. 138]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a large greenfield site in Value Area 1, it aligns with typologies shown to be viable when standard affordable housing contributions are applied [ED004, Table 8.1]. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG.</p>

d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools, health, and highways. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable with policy change, available and achievable in the SHELAA. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 174]. This SoCG confirms the anticipated delivery trajectory for 30 dwellings in 2027/28, 40 dwellings in 2028/29, 40 dwellings 2029/30, 90 dwellings in 2030/35. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy SP23, amend reference to 'Whalley's' to read 'Walleys' to ensure correct spelling. Upon amending this criterion, the Council considers this policy to be robust and sound.

BL8 Land adjacent to roundabout at West Avenue, Kidsgrove,	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process [ED029] identified and assessed the constraints pertinent to site BL8. The corresponding site assessment proforma [ED029, Appendix 2, pg. 148] details these considerations. Key constraints identified include parts of the site are affected by surface water flooding, the site being in a site of former mining activity. These constraints are addressed through the requirements set out within Policy BL8 [CD01, pg. 140-141]. Requirements 3 and 4 to require a sequential approach to flood risk and a coal mining risk assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy BL8 [CD01, pg. 140-141] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Cheddar Drive): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Sequential approach to flood risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 4 (Coal Mining Risk Assessment): This is clear and justified by the site's history and location within an area known for former mining activity. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2. • Requirement 5 (Contributions- Schools/ Health) This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.3,] which identifies needs for health facilities arising from cumulative development in Newcastle-under-Lyme Strategic Centre is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5 • Requirement 6 (Contributions- improvements to Talke Signals) This is clear. It is justified by the IDP [CD16, Table A.1, ref T21, pg. 159] and supporting transport evidence which identifies the need for improvements to the Talke Signals junction (A34/A5011/Coalpit Hill) to accommodate cumulative development growth in the area. It is effective in ensuring development mitigates its impact on the highway network in line with Policy IN1 and IN2.

	The site was granted full planning permission for 40 dwellings, with a decision notice issues 18/12/2024 [Housing Land Paper and Trajectory, EX/NBC/04, pg. 84].
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 40 dwellings is stated in Policy BL8 [CD01, pg. 140], based on the SHELAA assessment [ED006a, Site Assessments, page 99] Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a brownfield site in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. Therefore, viability is considered adequately addressed at the plan-making stage. Evidence of Viability is further supported by the fact that the site has planning permission [22/01067/FUL].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools, health, and highways. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability is further supported with approved planning permission [22/01067/FUL]. This anticipated delivery trajectory for 30 dwellings in 2028/29 and 25 dwellings in 2029/30. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy BL8 The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the allocation of 40 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy BL8. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

BL18 Land at Clough Hall,	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process [ED029] identified and assessed the constraints pertinent to site BL18. The corresponding site assessment proforma [ED029, Appendix 2, pg. 135 & 136] details these considerations. Key constraints identified include parts of the site are affected by surface water flooding, the site being located adjacent to Bathpool Site of Biological Importance, located near the A34 and a location of former mining activity. These constraints are addressed through the requirements set out within Policy BL18 [CD01, pg. 141-142]. Requirements 4, 5, 6 and 7 require a sequential approach to flood risk, an ecological buffer to Bathpool Park, a noise assessment, coal mining and landscape assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy BL18 [CD01, pg. 141-142] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access A34 Newcastle Road): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Layout is landscape led) to ensure development is not intrusive in significant views from the surrounding area. • Requirement 4 (Sequential approach to flood risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 5 (Ecological buffer to Bathpool Park) This recognises the site's proximity to an area of high biodiversity, with its recognition and mitigation of impacts in line with SE7 and SE8 to protection of a non-statutory designation. • Requirement 6 (Noise Assessment): Recognises the sites proximity to the A34 and sport and play facilities included as part of the site. • Requirement 7 (Coal mining assessment and landscape assessment) This is clear and justified by the site's history and location within an area known for former mining activity. It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2. • Requirement 8 (Retention and improvement of playing pitches). ED012 and ED)12a Playing Pitch Strategies recognise the need to improve and retain Clough Hall Park.

	<ul style="list-style-type: none"> Requirement 9 (Masterplan which considers cycle/pedestrian connectivity and retaining/enhancing trees) given the sites scale, ecological buffer and public rights of way that connect to the site, improvements will be required to cycle and pedestrian links. Requirement 10 (Contributions schools/health) This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3, pg. 161], which identifies needs for education and health facilities arising from cumulative development in Kidsgrove is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. Requirement 11 (Contributions to Talke Signals) This is clear. It is justified by the IDP [CD16, Table A.1, ref T21, pg. 159] and supporting transport evidence which identifies the need for improvements to the Talke Signals junction (A34/A5011/Coalpit Hill) to accommodate cumulative development growth in the area. It is effective in ensuring development mitigates its impact on the highway network in line with Policy IN1 and IN2. <p>Additionally, a signed Statement of Common Ground between the promoter (Staffordshire County Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy BL18 being appropriate and justified [EX/NBC/04, pg. 109].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes, the indicative yield is stated in policy [CD01, pg. 141] and derived from the SHELAA assessment [ED006a] and site selection report [ED029]. The site falls in Value Area 1 in the viability assessment and is considered viable [ED004, Table 8.1]. A site-specific assessment would be required at the planning application stage. The site is supported by a Statement of Common Ground with the site promotor [EX/NBC/04 Appendix 3, pg. 109] that indicates that the site is deliverable in the timescales set out in the Housing Trajectory [EX/NBC/04, Appendix 2].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities as well as Talke Signals. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Viability is addressed in point (c) above; the Viability Assessment [ED004] indicates viability for this site typology, which is considered adequately addressed for plan-making purposes. Deliverability is further supported by an agreed Statement of Common Ground between the Council and

	Staffordshire County Council [EX/NBC/04, Appendix 3, pg. 109]. This SoCG confirms the anticipated delivery trajectory of 75 dwellings in 2028/29 and 75 dwellings 2029/30. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a, MOD100, 142, 101]. For Policy BL18, recommends adding additional text to criterion 4 “including surface water flooding. A draining strategy for the site is also required” and “A site specific Flood Risk Assessment should be prepared or the site.” Additionally, criterion 11 should be amended to “financial contributions.” Upon the additional text to these criteria, the Council considers this policy to be robust and sound.

BL32 Land at Congleton Road, Butt Lane,	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process [ED029] identified and assessed the constraints pertinent to site BL32. The corresponding site assessment proforma [ED029, Appendix 2, pg. 144 & 145] details these considerations. Key constraints identified include off site highway works required for suitable means of access [CD01, Policy BL32, criterion 3]. Additionally, the site is a location of former mining activity. These constraints are addressed through the requirements set out with criterion 5 requiring a coal mining and landscape assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy BL32 [CD01, pg. 142-143] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Knowles View): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Off site highway works): To provide suitable access. • Requirement 4 (Pedestrian connection including enhancement of existing public right of way): A public right of way adjoins western boundary. Policy BL32 is clear and justified in preservation of this right of way in line with NPPF paragraph 105 and policy IN4 in the Local Plan. • Requirement 5 (Coal Mining Risk Assessment and Land Contamination Assessment): In relation to the area of former mining activity. • Requirement 6 (Contributions Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3, pg. 161], which identifies needs for education and health facilities arising from cumulative development in Kidsgrove is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. • Requirement 7 (Contributions – Talke Signals) This is clear. It is justified by the IDP [CD16, Table A.1, ref T21, pg. 159] and supporting transport evidence which identifies the need for improvements to the Talke Signals junction (A34/A5011/Coalpit Hill) to accommodate cumulative development growth in the area. It is effective in ensuring development mitigates its impact on the highway network in line with Policy IN1 and IN2.

	Additionally, a signed Statement of Common Ground between the promoter (Josephine Elaine Brookes) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy BL32 being appropriate and justified [EX/NBC/04, pg. 112].
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 20 dwellings is stated in Policy BL32 [CD01, pg. 142-143], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. The site is in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. However, a signed SoCG indicates viability has been adequately addressed. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The infrastructure requirements are contributions towards improvements to local schools and health facilities as well as Talke Signals. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability and viability are further supported by an agreed Statement of Common Ground between the Council and Josephine Elaine Brookes [EX/NBC/04, Appendix 3, pg. 112]. This SoCG confirms the anticipated delivery trajectory of 10 dwellings in 2027/28 and 10 dwellings 2028/29. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council does not consider there to be any significant omissions from Policy BL32. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the allocation of 20 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy BL32. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound

TK6 Site at Coalpit Hill, Talke,	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process undertaken by the Council, detailed in the Site Selection Report [ED029], identified the key constraints associated with site TK6. The site assessment proforma for TK6 within Appendix 2 of the Site Selection Report [ED029, pg. 388] summarises these.</p> <p>Key constraints identified include the site's history (associated with former mining activity), potential land contamination, and its location adjacent to the Talke Conservation Area which includes listed buildings.</p> <p>These constraints have been appropriately considered through the requirements set out within Policy TK6 itself [CD01, pg. 148]. Specifically, requirements 3, 4, 5, and 6 necessitate assessments and mitigation relating to heritage impacts, archaeology, flood risk, coal mining legacy, and land contamination prior to development.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TK6 [CD01, pg. 148] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (Access via Red Lion Close): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Heritage Impact Assessment): This is clearly worded and justified by the site's proximity to the Talke Conservation Area and associated heritage assets [ED029, pg. 388]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 4 (Archaeological Assessment): This requirement for a desk-based assessment is clear and justified as a precautionary measure standardly applied during the site assessment process [ED029]. It is effective in identifying and managing any potential below-ground heritage assets. • Requirement 5 (Sequential approach to flood risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 6 (Coal mining/contamination assessment): This is clear and justified by the site's history and location within an area known for former mining activity [ED029, pg. 388].

	<p>It is effective in ensuring the site is made safe and suitable for residential use, aligning with NPPF paragraph 189 and Policy SE2.</p> <ul style="list-style-type: none"> Requirement 7 (Contributions - Schools/Health): This is clear. It is justified by the Infrastructure Delivery Plan [CD16, Tables A.2 & A.3, pg. 161], which identifies needs for education and health facilities arising from cumulative development in the Kidsgrove Urban Centre / Talke area (including sites TK6, TK10, TK17, TK27). It is effective in ensuring development mitigates its impact on local services in line with Policy IN1 and IN5. Requirement 8 (Contributions - Highways/Talke Signals): This is clear. It is justified by the IDP [CD16, Table A.1, ref T21, pg. 159] and supporting transport evidence which identifies the need for improvements to the Talke Signals junction (A34/A5011/Coalpit Hill) to accommodate cumulative development growth in the area. It is effective in ensuring development mitigates its impact on the highway network in line with Policy IN1 and IN2.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 10 dwellings is explicitly stated in Policy TK6 [CD01, pg. 144], derived from the SHELAA assessment [ED006a]. The policy does not specify a particular development mix, allowing flexibility in line with the strategic Policy HOU2 (Housing Mix and Density) which will be applied at the application stage based on prevailing evidence of need.</p> <p>Viability considerations have been addressed through the Local Plan Viability Assessment [ED004]. Site TK6 falls within Value Area 1 and aligns most closely with small brownfield site typologies (e.g., Typology 3). The assessment indicates that viability for such sites in this location is marginal [ED004, Table 8.1]. However, given the small scale of the site (below the national NPPF threshold for affordable housing contributions - NPPF para 65), and the potential for specific site circumstances to influence costs and values, the allocation is considered appropriately addressed for plan-making viability purposes. A site-specific assessment would be required at the planning application stage.</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The key infrastructure requirements are contributions towards education, health, and highway improvements (Talke Signals junction). The need for this infrastructure to support cumulative growth in the area (including TK6 and other Talke allocations) is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements, as stipulated in Policy TK6 itself [CD01, pg. 148] and Policy IN1. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>

<p>e) Is there evidence that the development of the allocation is viable and developable during the plan period?</p>	<p>Viability is addressed in point (c) above; the Viability Assessment [ED004] indicates marginal viability for this site typology, which is considered adequately addressed for plan-making purposes. The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground between the Council and Staffordshire County Council [EX/NBC/04, Appendix 3, pg. 224]. This SoCG confirms the anticipated delivery trajectory for the 10 dwellings is within year 2027/28 [EX/NBC/04, Appendix 3, pg. 226, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.</p>
<p>f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?</p>	<p>The Council does not consider there to be any significant omissions from Policy TK6. The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for a small allocation of 10 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy TK6. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>

TK10 Land at Crown Bank	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process [ED029] identified and assessed the constraints pertinent to site TK10. The corresponding site assessment proforma [ED029, Appendix 2, pg. 366] details these considerations.</p> <p>Key constraints identified include the site's location within the Green Belt, its status as Grade 3 agricultural land, proximity to the Talke Conservation Area (including listed buildings), potential noise impacts from adjacent industrial uses, and potential land contamination associated with former mining activity and a historic landfill adjacent to the southern boundary. The site also contains areas of surface water flood risk.</p> <p>These constraints are addressed through the requirements set out within Policy TK10 [CD01, pg. 148]. Requirements 4, 6, 7, 8, 9, and 10 specifically mandate assessments and mitigation relating to landscape buffers, long-range views, heritage assets, archaeology, coal mining/contamination, noise impacts, and flood risk.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TK10 [CD01, pg. 148] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access via Pit Lane): Clearly defines the required access point, justified by the site assessment process [ED029] identifying this as the logical access from the existing highway network. Effective in managing transport impacts. • Requirement 3 (Landscape-led layout/design): This requirement reflects the site's location on the edge of the settlement adjacent to open countryside. It is justified by the need to ensure development respects its surroundings and is consistent with Policy PSD7 (Design). It is effective in mitigating visual impacts. • Requirement 4 (Hedgerow/Tree Retention & Landscape Buffer): Clearly worded, justified by the presence of existing natural features and the need to provide appropriate screening for the development, particularly along the eastern extent bordering open land [ED029, pg. 366]. Effective in conserving landscape character and biodiversity, consistent with Policy SE11. • Requirement 5 (Preserving long-range views): This is justified by the site's elevated position relative to the surrounding area and potential views towards the Grade II listed church tower within the Talke Conservation Area. It is effective in protecting visual amenity and heritage settings, consistent with Policy SE9 and SE10.

	<ul style="list-style-type: none"> • Requirement 6 (Heritage Impact Assessment): Justified by the site's location adjacent to the Talke Conservation Area and nearby listed buildings [ED029, pg. 366]. Clearly requires assessment and mitigation, ensuring compliance with NPPF Chapter 16 and Policy SE9. • Requirement 7 (Archaeological Recording): Justified as a precautionary requirement standardly applied during site assessment [ED029]. Effective in managing potential below-ground heritage assets. • Requirement 8 (Coal mining/Contamination Assessment): Clear and justified due to the site's location within a Coal Mining Development High Risk Area and proximity to a historic landfill [ED029, pg. 366]. Effective in ensuring the site is safe and suitable for development, consistent with NPPF paragraph 189 and Policy SE2. • Requirement 9 (Sequential approach to flood risk): Standard requirement reflecting national policy (NPPF Chapter 14) and Local Plan Policy SE3, justified by the presence of some surface water flood risk on site. Effective in ensuring appropriate flood risk management. • Requirement 10 (Noise Assessment): Justified by the site's proximity to adjacent industrial uses to the south [ED029, pg. 366]. Clearly requires assessment and mitigation, ensuring residential amenity is protected in line with Policy SE12. • Requirement 11 (Enhancement of PRoW/Green Infrastructure Network): Clear requirement justified by the presence of a Public Right of Way along the southern boundary and the aims of Policy IN4 and SE14 to improve connectivity and green networks. Effective in delivering wider sustainability benefits. • Requirement 12 & 13 (Contributions - Schools/Health & Talke Signals): Justified by the IDP [CD16] identifying cumulative needs for education, health, and highway infrastructure (Talke Signals junction, ref T21) in the Kidsgrove Urban Centre / Talke area. Effective in ensuring development mitigates its impacts in line with Policies IN1, IN2, and IN5.
<p>c) Have the indicative yield, development mix and viability considerations been adequately addressed?</p>	<p>Yes. The indicative yield of 170 dwellings is stated in Policy TK10 [CD01, pg. 144], derived from the SHELAA [ED006a]. No specific mix is mandated, allowing flexibility under Policy HOU2. The Local Plan Viability Assessment [ED004] assessed the site. As a Greenfield site in Value Area 1, it aligns with relevant housing typologies (e.g., 150 houses @ 35 dph). The assessment shows that such typologies in this value area are generally viable with a 30% affordable housing requirement [ED004, Table 8.1 shows headroom for 150 units]. Therefore, viability considerations have been adequately addressed. There is a signed statement of common ground on the site [EX/NBC/04, pg. 209] that indicates that the site is deliverable.</p>

d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. As outlined in point (b), the requirements for contributions towards education, health, and highways infrastructure are evidenced by the Infrastructure Delivery Plan (IDP) [CD16], which is based on provider engagement. The IDP confirms the need arising from cumulative development in the area and outlines delivery mechanisms, primarily Section 106 contributions. Access via Pit Lane is considered achievable. Therefore, the assumptions are considered realistic and deliverable, contingent on securing necessary contributions.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Yes. Viability is confirmed by the Local Plan Viability Assessment [ED004] as discussed in point (c). The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability within the plan period is supported by an agreed Statement of Common Ground between the Council and the site promoter [EX/NBC/04, Appendix 3, pg. 209]. This SoCG confirms the anticipated delivery trajectory for the 170 dwellings commences in 2027/28, delivering 90 units within the first five years (up to 2029/30), with the remaining 80 units delivered in the 2030-2035 period [EX/NBC/04, Appendix 3, pg. 212, para 6.2]. Subject to addressing the policy requirements (including assessments and Green Belt boundary definition), there are no known insurmountable constraints to delivery within the plan period.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council considers the policy requirements are comprehensive, addressing the key site-specific issues identified in the evidence base. The policy provides sufficient flexibility regarding development mix and detailed design, which would be determined at the application stage. The Council's Schedule of Proposed Modifications [CD15 and CD15a] does not propose any changes to Policy TK10. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

TK17 Land off St Martins Road	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process [ED029] identified the constraints associated with site TK17. The site assessment proforma for TK17 [ED029, Appendix 2, pg. 374] provides a summary of these considerations. Key constraints identified include the site's location within the Green Belt, potential impacts on the adjacent Talke Conservation Area and nearby listed building (Harecastle Farmhouse, Grade II), the presence of Public Rights of Way crossing the site, potential noise impacts from the A34 and A500, potential land contamination associated with former mining activity and a historic landfill site to the south, and the presence of sewers crossing the site. These constraints have been appropriately considered and addressed through the specific requirements set out within Policy TK17 [CD01, pg. 150], particularly requirements 3, 4, 6, 7, 8, 9, 10, and 11.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TK17 [CD01, pg. 150] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access via St Martins Road): Clearly defines the access point, justified by the site assessment [ED029] as the logical route from the existing highway network. Effective in managing access arrangements. • Requirement 3 (Landscape-led layout/design & buffer): Justified by the site's Green Belt location and proximity to the open countryside to the east. Requirement for a buffer is effective in mitigating visual impacts and defining a defensible Green Belt boundary, consistent with Policy PSD5 and SE10. • Requirement 4 (Heritage Impact Assessment): Justified by the site's proximity to the Talke Conservation Area and the Grade II listed Harecastle Farmhouse [ED029, pg. 374]. Clearly requires assessment and sensitive design, ensuring compliance with NPPF Chapter 16 and Policy SE9. • Requirement 5 (Archaeological Recording): Justified as a precautionary requirement standardly applied during site assessment [ED029]. Effective in managing potential below-ground heritage assets. • Requirement 6 (Sequential approach to flood risk): Standard requirement reflecting national policy (NPPF Chapter 14) and Local Plan Policy SE3. • Requirements 7 & 8 (Coal mining/Contamination Assessment): Clear and justified due to the site's location within a Coal Mining Development High Risk Area and proximity to a

	<p>historic landfill [ED029, pg. 374]. Effective in ensuring the site is safe and suitable for development, consistent with NPPF paragraph 189 and Policy SE2.</p> <ul style="list-style-type: none"> • Requirement 9 (Noise Impact Assessment): Justified by the site's proximity to the A34 and A500 trunk roads [ED029, pg. 374]. Requires assessment and mitigation, ensuring acceptable residential amenity levels consistent with Policy SE12. • Requirement 10 (Enhancement of pedestrian/cycle links): Justified by the desire to promote sustainable transport (Policy IN2, IN4) and improve connectivity, including links to the nearby A53 cycle route. Effective in delivering wider network benefits. • Requirement 11 (Sewers): Justified by the known presence of sewers crossing the site. Clearly requires consideration to ensure development does not compromise existing utility infrastructure and appropriate standoff distances are maintained, consistent with Policy IN7. • Requirement 12 & 13 (Contributions - Schools/Health & Talke Signals): Justified by the IDP [CD16] identifying cumulative needs for education, health, and highway infrastructure (Talke Signals junction, [CD16, ref T21, pg159] in the Kidsgrove Urban Centre / Talke area. Effective in ensuring development mitigates its impacts in line with Policies IN1, IN2, and IN5.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 40 dwellings is stated in Policy TK17 [CD01, pg. 150], derived from the Strategic Housing and Employment Land Availability Assessment (SHELAA) [ED006a].</p> <p>Development mix is not specified at this strategic stage, allowing flexibility for proposals to align with Policy HOU2 (Housing Mix and Density) and prevailing evidence of need at the planning application stage.</p> <p>Viability considerations for the site allocation have been addressed through the whole-plan Local Plan Viability Assessment [ED004]. As a Greenfield site in Value Area 1, TK17 aligns most closely with the '40 Houses @ 35dph' typology tested in the study. The assessment [ED004, Table 8.1] indicates that for this typology and value area, achieving viability is challenging when factoring in policy-compliant affordable housing contributions under Policy HOU1 (which requires 30% for greenfield sites). Specifically, the assessment shows this typology is viable at 10% affordable housing, marginal at 15%, and not viable at 20%, 25% or 30%.</p> <p>This assessment confirms that viability has been considered at the plan-making stage. It highlights that, based on the strategic-level testing, demonstrating viability at the required 30% affordable housing level will be a key consideration for any future planning application on this site. However, the Viability Assessment is a high-level tool, and actual viability will depend on specific scheme</p>

	details, prevailing market conditions, and potential site-specific costs or efficiencies not captured in the strategic modelling. There is a statement of common ground for the site [EX/NBC/04, pg. 215] which supports the delivery of the site.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The requirements for contributions towards education, health, and highways (Talke Signals junction, ref T21) are evidenced in the IDP [CD16], based on provider engagement. The IDP indicates these are necessary to support cumulative growth and outlines developer contributions as the primary delivery mechanism. Access via St Martins Road is considered achievable. Therefore, infrastructure assumptions are deemed realistic and deliverable, subject to securing necessary contributions via S106 agreements (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Yes. Viability is addressed in point (c), indicating potential challenges but not precluding development, subject to detailed assessment at application stage. The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground between the Council and Araripe Limited [EX/NBC/04, Appendix 3, pg. 214]. This SoCG confirms the anticipated delivery trajectory for the 40 dwellings is within year 2028/29 [EX/NBC/04, Appendix 3, pg. 217, para 6.2]. Subject to addressing the specific policy requirements (including assessments and Green Belt boundary definition), no insurmountable constraints to delivery within the plan period are identified.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council considers Policy TK17 addresses the key site-specific matters identified through the evidence base and provides appropriate flexibility. The Council's Schedule of Proposed Modifications [CD15 and CD15a] does not propose any changes to Policy TK17. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

TK27 Land off Coppice Road	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints associated with site TK27 were identified and considered during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 376] details these. The primary constraints identified include the site's location within the Green Belt, its classification as Grade 3 agricultural land, potential land contamination from former mining activity (Coal Authority High Risk Area), the presence of Public Rights of Way, potential impacts on adjacent Ancient Woodland and the Talke Conservation Area (including nearby listed buildings), and potential surface water flood risk. These constraints have been appropriately factored into the requirements of Policy TK27 [CD01, pg. 151], specifically requirements 3, 5, 6, 7, 8, and 9 which mandate assessments and mitigation related to heritage, archaeology, flood risk, contamination, coal mining legacy, and improvements to public rights of way.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TK27 [CD01, pg. 147] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access via Coppice Road): Clearly defines the primary access point, justified by the site assessment [ED029]. Effective in directing access arrangements. • Requirement 3 (Heritage Impact Assessment): Justified by the site's proximity to the Talke Conservation Area and listed buildings [ED029, pg. 376]. Clearly requires assessment and sensitive design, ensuring compliance with NPPF Chapter 16 and Policy SE9. • Requirement 4 (Landscape-led layout/design): Justified by the site's Green Belt location and relationship to the surrounding landscape. Effective in mitigating visual impacts and ensuring appropriate design (Policy PSD7, SE10). • Requirement 5 (Archaeological Recording): Justified as a standard precautionary requirement applied during site assessment [ED029]. Effective in managing potential below-ground heritage assets. • Requirement 6 (Sequential approach to flood risk): Standard requirement reflecting national policy (NPPF Chapter 14) and Local Plan Policy SE3, justified by the identification of some surface water flood risk on parts of the site. Effective in guiding development away from risk areas. • Requirement 7 (Coal mining/Contamination Assessment): Clear and justified due to the site's location within a Coal Mining Development High Risk Area [ED029, pg. 376]. Effective

	<p>in ensuring the site is safe and suitable for development, consistent with NPPF paragraph 189 and Policy SE2.</p> <ul style="list-style-type: none"> • Requirement 8 (Footway Improvements): Justified by the need to improve highway safety and promote sustainable travel, particularly given the site's relationship to local schools and facilities. Effective in delivering necessary pedestrian infrastructure (Policy IN2, IN4). • Requirement 9 & 10 (Contributions - Schools/Health & Talke Signals): Justified by the IDP [CD16] identifying cumulative needs for education, health, and highway infrastructure (Talke Signals junction, ref T21) in the Kidsgrove Urban Centre / Talke area. Effective in ensuring development mitigates its impacts in line with Policies IN1, IN2, and IN5.
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 90 dwellings is stated in Policy TK27 [CD01, pg. 151], derived from the SHELAA [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. The Local Plan Viability Assessment [ED004] assessed the site. As a Greenfield site in Value Area 1, it aligns with relevant housing typologies (e.g., between 60 and 100 houses @ 35dph). The assessment shows that such typologies in this value area demonstrate some viability at lower affordable housing levels (e.g., 10-15%) but become challenged at the policy requirement of 30% [ED004, Table 8.1]. The assessment indicates viability has been considered, but successful delivery at 30% affordable housing may require specific market conditions or scheme efficiencies, to be confirmed at application stage. The site has a signed statement of common ground [EX/NBC/04, pg. 220] which supports the evidence of delivery on the site.</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The requirements for contributions towards education, health, and highways (Talke Signals junction, ref T21) are evidenced by the IDP [CD16], based on provider engagement. The IDP confirms the need arising from cumulative development and outlines developer contributions via S106 agreements (Policy IN1) as the delivery mechanism. The requirement for footway improvements on Coppice Road / Merelake Road / Coal Pit Lane is a direct site-related requirement considered necessary and deliverable. Access via Coppice Road is feasible. Therefore, infrastructure assumptions are realistic and deliverable, subject to securing necessary contributions.</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Yes. Viability is addressed in point (c). While strategic testing indicates viability pressure at the full 30% affordable housing requirement, it does not preclude development, which could be viable under different market conditions or with variations tested at application stage. The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability within the plan period is supported by an agreed Statement of Common Ground between the Council and Paul Smith Strategic Land Group</p>

	[EX/NBC/04, Appendix 3, pg. 219]. This SoCG confirms the anticipated delivery trajectory for the 90 dwellings commences in 2026/27, delivering all units by 2029/30 [EX/NBC/04, Appendix 3, pg. 222, para 6.2]. Subject to addressing the specific policy requirements (including assessments and Green Belt boundary definition), no insurmountable constraints to delivery within the plan period are identified.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council considers Policy TK27 addresses the key site-specific matters identified through the evidence base and provides appropriate flexibility regarding mix and detailed design. The Council's Schedule of Proposed Modifications [CD15 and CD15a] does not propose any changes to Policy TK27. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

TB6 Former Pool Dam Pub	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TB6 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 412] provides a summary.</p> <p>Key constraints identified are the site's status as a brownfield site (former pub), its close proximity to the operational Walleys Quarry Landfill site to the west (potential odour impacts), access considerations via Wain Avenue and Orme Road, and potential land contamination associated with its former use. These constraints are directly addressed through requirements 2, 3, 4, and 5 of Policy TB6 [CD01, pg. 152], which deal with the landfill operation, site access, land contamination, and odour impacts, respectively.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TB6 [CD01, pg. 152] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (No occupation before landfill cessation): This provides a clear temporal restriction linked directly to mitigating the primary constraint of the adjacent landfill. It is justified by the need to protect residential amenity (Policy SE12) and is effective in doing so by delaying occupation until the source of potential harm ceases operation (anticipated December 2026). • Requirement 3 (Access via Wain Avenue/Orme Road): Clearly specifies the access points, justified by the site's context and existing road network [ED029]. Effective in ensuring appropriate access is achieved. • Requirement 4 (Land contamination assessment/mitigation): This requirement is clear and justified as a standard precaution for brownfield sites, particularly former commercial premises, ensuring the land is suitable for residential use (NPPF para 189, Policy SE2). It is effective in managing potential risks. • Requirement 5 (Odour assessment/mitigation): Clearly worded and directly justified by the site's proximity to Walleys Quarry Landfill [ED029, pg. 412], ensuring potential amenity impacts are assessed and addressed (Policy SE12). Effective in safeguarding future residents' amenity. • Requirement 6 (Contributions - Schools/Health): Clear requirement justified by the IDP [CD16, Tables A.2 & A.3], which identifies cumulative needs arising from development in the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5).

c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 13 dwellings is stated in Policy TB6 [CD01, pg. 152], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a small brownfield site in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. However, Policy HOU1 only requires affordable housing contributions on sites of 10 dwellings or more. Given the yield of 13 dwellings, only a small contribution would normally be sought, but more significantly, viability is likely improved as the site is assumed to deliver market housing only. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1). Access is achievable via the existing highway network fronting the site. Therefore, infrastructure assumptions are realistic and deliverable.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Yes. Viability is addressed in point (c) above. The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. The Council's Housing Land Paper and Trajectory confirms the site's deliverability, anticipating all 13 dwellings will be completed in the year 5-10 of the Plan period [EX/NBC/04, Appendix 3, pg. 186]. No insurmountable constraints are identified.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council considers Policy TB6 addresses the key site-specific matters, particularly the relationship with the adjacent landfill. It provides sufficient flexibility for a small site. The Council's Schedule of Proposed Modifications [CD15 and CD15a] does not propose any changes to Policy TB6. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

TB19 Land South of Newcastle Golf Club	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TB19 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 340] provides a summary. Key constraints identified are the site's status in the Green Belt, the proximity to a Site of Biological importance and Keele Hall Registered Park and Garden. The site is also in close proximity to the M6 Motorway. These constraints are directly addressed through requirements 3,4,5,7,8 and 9 of Policy TB19 [CD01, pg. 153], which deal with the landscaping, heritage, ecological buffers, noise assessments and buffers to the M6 alongside other requirements.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TB19 [CD01, pg. 153] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access) confirming the expected access arrangements into the site from Whitmore Road. • Requirement 3 (Landscape) is a requirement to support the landscape led delivery of the site, recognising the location of the site with the Green Belt • Requirement 4 & 5 (Heritage) requires a heritage impact assessment and programme of archaeological recording given the sites location to the setting of the Keele Hall Conservation Area and the Keele Registered Park and Garden • Requirement 6 (Flooding) requires the understanding of flood risk impacts on the site. • Requirement 7 (ecological buffers) requires suitable buffers to be provided to local ecological designations. • Requirement 8 (Noise Assessment) is required given the sites proximity to the M6 motorway. • Requirement 9 (Open space) acknowledges that a buffer is required within the site to the M6 motorway with appropriate reference to noise and ecological impacts. • Requirement 10 (Geo-environmental survey) given that applications for fracking have taken place in the local area. • Requirement 11 (Link Road) the need for the Link Road is identified in the Strategic Transport Assessment [ED011, pg. 66] and Infrastructure Delivery Plan [CD12, pg. 159]

	<ul style="list-style-type: none"> Requirement 12 (contributions) the need for contributions are identified in the Infrastructure Delivery Plan for local schools [CD12, 161] and health facilities [CD12, pg. 163].
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 550 dwellings is stated in Policy TB19[CD01, pg. 153], based on the SHELAA assessment [ED006a] and Site Selection Report [ED029]. Development mix is not specified, allowing flexibility under Policy HOU2.</p> <p>Viability was considered via the Local Plan Viability Assessment [ED004]. The site is in the higher value area in the Borough. Deliverability is further supported by an agreed Statement of Common Ground between the Council and Richborough Estates [EX/NBC/04, Appendix 3, pg. 176].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The infrastructure requirements are the provision of a link road. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Yes. Viability is addressed in point (c) above. The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. The Council's Housing Land Paper and Trajectory confirms the site's deliverability [EX/NBC/04, Appendix 3, pg. 176]. No insurmountable constraints are identified.</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	<p>The Council considers Policy TB19 addresses the key site-specific matters identified through the evidence base and provides appropriate flexibility regarding mix and detailed design. The Council's Schedule of Proposed Modifications [CD15 and CD015a] proposes a number of modifications to the Policy, including MOD 145 that confirms the need for a Flood Risk Assessment on the site. MOD 107 & 134 require the provision of a ball strike assessment on the site alongside MOD 157 which seeks to provide consistency as to how the link road from the A525 and A53 is required. The policy as drafted in the submission Local Plan [CD01] is considered sound.</p>

TB23 Land West of Galingale View	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TB23 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 342] provides a summary. Key constraints identified are the site's proximity to Walleys Quarry, historical uses on site and potential flood risk. These constraints are directly addressed through requirements 2, 4, 5 and 6 of Policy TB23 [CD01, pg. 155], which deal with Walleys Quarry, need for coal mining and land contamination assessment, odour assessment and flood risk considerations.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TB23 [CD01, pg. 155] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Walleys Quarry) notes that no dwellings should be occupied until the cessation of disposal of non-hazardous waste at Walleys Quarry • Requirement 3 (Access) confirms access arrangements into the site by a primary and secondary access point. • Requirement 4 (Coal Mining) the requirements for a coal mining risk assessment is necessary given the sites proximity to a coal mining risk zone. • Requirement 5 (Land Contamination Assessment) requires a land contamination assessment, odour assessment and associated mitigation strategy given the sites proximity to Walleys Quarry • Requirement 6 (Flood Risk) requires that development is directed to areas at lowest risk of flooding on site. • Requirement 7 (PROW / Green Infrastructure) supports the improvement of existing public rights of way and Green infrastructure in the local area. • Requirement 8 (contributions) the need for contributions are identified in the Infrastructure Delivery Plan for local schools [CD12, 161] and health facilities [CD12, pg. 163].
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 124 dwellings is stated in Policy TB23 [CD01, pg. 155], based on the SHELAA assessment [ED006a] and Site Selection Report [ED029]. Development mix is not specified, allowing flexibility under Policy HOU2.</p>

	Viability was considered via the Local Plan Viability Assessment [ED004]. The site is in the higher value area in the Borough. Deliverability is further supported by an agreed Statement of Common Ground between the Council and Persimmon Homes [EX/NBC/04, Appendix 3, pg. 181].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The need for this infrastructure to support cumulative growth in the area is evidenced in the Infrastructure Delivery Plan (IDP) [CD16]. The IDP outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	Yes. Viability is addressed in point (c) above. The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. The Council's Housing Land Paper and Trajectory confirms the site's deliverability [EX/NBC/04, Appendix 3, pg. 181].
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council considers Policy TB23 addresses the key site-specific matters identified through the evidence base and provides appropriate flexibility regarding mix and detailed design. The Council's Schedule of Proposed Modifications [CD15 / CD015a] proposes a modification to the Policy [MOD138] that confirms the need for a Flood Risk Assessment on the site.

TC7 Ryecroft	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The requirements set out in Policy TC7 [CD01, pg. 157] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (access) confirms the expected access arrangement into the site, via Corporation Street and Ryecroft. • Requirement 3 (Contaminated Land) recognises that the historical uses on the site. • Requirement 4 (Flood Risk) is justified as part of the site is impacted by surface water flooding [ED013 & accompanying maps]. • Requirement 5 (Heritage Impact Assessment) serves to examine & ensure that the development responds sensitively to the significant heritage assets in close proximity, with due regard to ED016 (Appendix A20 TC7). • Requirement 6 (Design) recognises that the design should recognise its town centre location and proximity to heritage assets. • Requirement 7 (Air Quality Management Area) as the site falls within the Newcastle-under-Lyme Town Air Quality Management Area. • Requirement 8 (Noise Assessment and Mitigation Strategy) owing to the sites location adjacent to high volume road traffic networks. • Requirement 9 & 10 (Active travel opportunities) to improve connectivity to the town centre and aligning with the objectives of the County Council Local Cycling & Walking Infrastructure Plan. • Requirement 11 (Contributions) notes that appropriate contributions should be made to improve the capacity of local schools and health facilities in line with the Infrastructure Delivery Plan [CD016].
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes. The site selection process undertaken by the Council, detailed in the Site Selection Report [ED029, pg. 362], identifies the key constraints associated with the site and this understanding has been enhanced through the completion of relevant studies including the Local Plan Site Heritage Impact Assessment [ED016], Strategic Flood Risk Assessment [ED013] and Strategic Transport Assessment [ED011]. The built heritage, transport, air quality and flood risk constraints</p>

	have been appropriately considered through the requirements set out within Policy TC7 itself [CD01, pg. 156]. A number of planning applications have been submitted on the site [24/00792/FUL] for 53 retirement apartments and [24/00840/FUL] for 175 dwellings and are recommended for approval at the Council planning committee on the 29 April 2025. Planning permission for which was granted – see e) below
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Reflecting the proposals detailed within the recently submitted planning applications – detailed further in e) below – and the proposed modification – detailed further in f) below, Policy TC7 will no longer incorporate an element (1.63ha) in CD01 (pg. 152-153).
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The Infrastructure Delivery Plan (IDP) [CD16 Appendix A] identifies the prospective role that TC7 could play in yielding developer contributions for travel (para 3.60), education (pg. 61-79), health and wellbeing, green infrastructure, utilities, and community facilities as part of the cumulative development in the strategic centre (& elsewhere). The IDP also outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements and Policy IN1. The IDP is based on engagement with infrastructure providers (see CD16 Appendix C). Therefore, the infrastructure assumptions, particularly those detailed in 11. of Policy TC7 are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Site TC7 is the subject of planning applications (resolution to grant planning permission following planning committee on the 29 April 2025) under references 24/00840/FUL for residential development comprising 175 dwellings and associated landscaping, and 24/00792/FUL Development of 53 no. retirement apartments (Use Class C3), including new vehicular access, car parking, landscaping, and associated infrastructure. These schemes (by Capital & Centric and McCarthy Stone) form part of the wider regeneration in & around Newcastle town centre. The remaining part of the site incorporates a very recently opened (since early 2025) multi-storey car park.</p> <p>The site is considered deliverable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site TC7 was identified as suitable and available (subject to addressing constraints). There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.</p>

<p>f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?</p>	<p>TC7's policy requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the nature & scale of uses proposed, setting key parameters (including access, and relevant assessments) and acknowledging its locational context. Reflecting the exclusively residential focus of proposals within the submitted applications, modifications [CD15a] are proposed by the Council to Policy TC7 [MOD147] to remove reference to 1.63ha of gross employment land. Subject to these modifications, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>
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TC19 Hassell Street Car Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC19 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 348] provides a summary. Key constraints identified are the site's proximity to heritage assets, proximity to an AQMA. These constraints are directly addressed through requirements 5, 6, and 7 of Policy TC19 [CD01, pg. 158], which is a heritage impact assessment and heritage design requirements as well as an air quality assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC19 [CD01, pg. 158] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access via Hassell Street): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029]. • Requirement 3 (Development not taking place before castle car park is operational): This is to ensure the site can be considered for alternative uses without compromising parking need in the town centre. • Requirement 4 (Element of car parking retained for local businesses): To minimise impacts on local businesses. • Requirement 5 (Heritage Impact Assessment) Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 6 (Design sympathetic to heritage assets and historic street pattern): Justified by the site's proximity to Church of St Paul, Brampton Conservation area and other heritage assets as described in the site selection report [ED029, page 348] • Requirement 7 (Air Quality Assessment): Required and justified in relation to the site proximity to Newcastle-under-Lyme Town Air Quality Management Area. • Requirement 8 (Contributions Schools/ Health): Clear requirement justified by the IDP [CD16, Tables A.2], which identifies cumulative needs arising from development in the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5) <p>Additionally, a signed Statement of Common Ground between the promoter (Newcastle-under-Lyme Borough Council) and Newcastle-under-Lyme Borough Council agrees on the matters of</p>

	specific requirements contained within Policy TC19 being appropriate and justified [Housing Land Paper and Trajectory, EX/NBC/04, pg. 187].
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 5 dwellings is stated in Policy TC19 [CD01, pg. 158], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a small brownfield site in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. However, Policy HOU1 only requires affordable housing contributions on sites of 10 dwellings or more. Given the yield of 5 dwellings, viability is likely improved as the site is assumed to deliver market housing only. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG [EX/NBC/04, pg188].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable, likely to become available and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 188]. This SoCG confirms the anticipated delivery trajectory for the 5 dwellings is within year 2027/28 [EX/NBC/04, Appendix 3, pg. 188, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period. Castle car park is now operational, fulfilling requirement 3.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy TC19, amend 1st sentence of policy to read 'is partially allocated....' to clarify that part of the site will accommodate residential development but the remaining will continue to serve as car parking. Upon amending this criterion, the Council considers this policy to be robust and sound.

TC20 King Street Car Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC20 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 350] provides a summary. Key constraints identified are the site's former landfill use, proximity to heritage assets, proximity to an AQMA and nearby commercial uses. These constraints are directly addressed through requirements 4, 5, 6, and 7 of Policy TC20 [CD01, pg. 158], which is a contaminated land assessment, heritage impact assessment and heritage design requirements, an air quality assessment and noise assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC20 [CD01, pg. 158] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1(Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Development not taking place before castle car park is operational): This is to ensure the site can be considered for alternative uses without compromising parking need in the town centre. • Requirement 3 (Access via King Street): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 4 (Contaminated Land Assessment): Justified due to the site's former landfill use. • Requirement 5 (Heritage Impact Assessment) Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 6 (Design sympathetic to heritage assets): Justified by the site's proximity to Church of St Paul, Church of St Giles, Church of St George, Brampton Conservation area and other heritage assets as described in the site selection report [ED029, page 350] • Requirement 7 (Air Quality Assessment): Required as the site is located within Newcastle-under-Lyme Town Air Quality Management Area. • Requirement 8 (Noise Assessment): Justified in relation to nearby commercial uses and impact of road noise from A52 and A53. • Requirement 9 (Contributions Schools/ Health): Clear requirement justified by the IDP [CD16, Tables A.2], which identifies cumulative needs arising from development in the

	<p>Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5)</p> <p>Additionally, a signed Statement of Common Ground between the promoter (Newcastle-under-Lyme Borough Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy TC20 being appropriate and justified [Housing Land Paper and Trajectory EX/NBC/04, pg. 192].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 10 dwellings is stated in Policy TC20 [CD01, pg. 154], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a small brownfield site in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. However, Policy HOU1 only requires affordable housing contributions on sites of 10 dwellings or more. Given the yield of 10 dwellings, viability is likely improved as the site is assumed to deliver market housing only. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG [EX/NBC/04, pg. 192].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>The site is considered developable within the plan period. It was assessed as suitable, likely to become available and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 192]. This SoCG confirms the anticipated delivery trajectory for the 10 dwellings is within year 2029/30 [EX/NBC/04, Appendix 3, pg. 192, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period. Castle car park is now operational, fulfilling requirement 2.</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	<p>The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy TC20, amend 1st sentence of policy to read 'is partially allocated....' to clarify that part of the site will accommodate residential development but the remaining will continue to serve as car parking. Upon amending this criterion, the Council considers this policy to be robust and sound.</p>

TC22 Marsh Parade	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC22 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 352] provides a summary. Key constraints identified are the site's former land use, proximity to heritage assets, proximity to an AQMA and nearby commercial uses. These constraints are directly addressed through requirements 4, 5, 6, and 7 of Policy TC22 [CD01, pg. 159], which is a contaminated land assessment, heritage impact assessment and heritage design requirements, an air quality assessment and noise & odour assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC22 [CD01, pg. 159] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access via North Street/ Hassell Street): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 3 (Land Contamination Assessment): Justified due to the site's former land use. • Requirement 4 (Heritage Impact Assessment): Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 5 (Design sympathetic to heritage assets and historic street pattern): Justified by the site's proximity to Church of St Paul, 21,23, 25 Marsh Parade and other heritage assets as described in the site selection report [ED029, page 352] • Requirement 6 (Archaeological watching brief) supported by the Council's Heritage Impact Assessment [ED016] • Requirement 7 (Air Quality Assessment): Due to the site falling partially within Newcastle-under-Lyme Town Air Quality Management Area, • Requirement 8 (Noise and Odour Assessment): Required in relation to nearby commercial uses and impact of A53 and A52 • Requirement 9 (Contributions Schools/Health): Clear requirement justified by the IDP [CD16, Tables A.2 & A.3], which identifies cumulative needs arising from development in

	<p>the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5).</p> <p>Additionally, a signed Statement of Common Ground between the promoter (Aspire represented by Knights) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy TC22 being appropriate and justified [Housing Land Paper and Trajectory EX/NBC/04, pg. 197]</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 60 dwellings is stated in Policy TC22 [CD01, pg. 154-155], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004, Table 8.1]. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG [EX/NBC/04, pg. 194].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>The site is considered developable within the plan period. It was assessed as suitable, likely to become available and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 197]. This SoCG confirms the anticipated delivery trajectory for the 30 dwellings is within year 2026/27 and 30 in 2027/28 (promoter anticipating a delivery of 60 dwellings) [EX/NBC/04, Appendix 3, pg. 197, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	<p>The Council does not consider there to be any significant omissions from Policy TC22 The requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the allocation of 70 dwellings; it sets key parameters (access, assessments) while allowing details of layout and design to be determined at the application stage. The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. No modifications are proposed by the Council to Policy TC22. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound</p>

TC40 Blackfriars Road Car Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC40 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 354] provides a summary. Key constraints identified are the site's potential impact on Lyme Brook, proximity to heritage assets, flood risk, and nearby commercial uses. These constraints are directly addressed through requirements 3, 4, 5, 7 and 8 of Policy TC40 [CD01, pg. 160], which is a contaminated land assessment, heritage impact assessment and heritage design requirements, a sequential approach to flood risk and noise & odour assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC40 [CD01, pg. 160] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Access via Blackfriars Road): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 3 (Land Contamination Assessment): Justified in relation the potential impact on Lyme Brook • Requirement 4 (Heritage Impact Assessment): Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 5 (Design sympathetic to heritage assets and historic street pattern): Justified by the site's proximity to Old Orme Boys School, Methodist Church and other heritage assets as described in the site selection report [ED029, page 354] • Requirement 6 (Desk Based Archaeological Assessment): This requirement is clear and justified as a precautionary measure. It is effective in identifying and managing any potential below-ground heritage asset. • Requirement 7 (Sequential approach to flood risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 8 (Noise Assessment): Justified in relation to nearby commercial uses and impact of road noise from A53 and A525.

	<ul style="list-style-type: none"> Requirement 9 (Improvement in Footway access): Justified by the need to improve highway safety and promote sustainable travel, particularly given the site's relationship to local schools and facilities. Effective in delivering necessary pedestrian infrastructure (Policy IN2, IN4). Requirement 10 (Contributions Schools/Health): Clear requirement justified by the IDP [CD16, Tables A.2], which identifies cumulative needs arising from development in the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5) <p>Additionally, a signed Statement of Common Ground between the promoter (Newcastle-under-Lyme Borough Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy TC40 being appropriate and justified [EX/NBC/04, pg. 188]</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 10 dwellings is stated in Policy TC40 [CD01, pg. 155], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a small brownfield site in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG [EX/NBC/04, pg. 188].
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable, available, and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 192]. This SoCG confirms the anticipated delivery trajectory for the 10 dwellings is within year 2027/28 [EX/NBC/04, Appendix 3, pg. 192, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy TC40, add additional text, as follows: - “A site-specific Flood Risk Assessment should be prepared for the site alongside a Surface Water Drainage Strategy which includes a SuDs maintenance and management plan” To ensure

	consistency with the outcomes of the Level 2 Strategic Flood Risk Assessment. Upon amending this criterion, the Council considers this policy to be robust and sound.
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TC50 Cherry Orchard Car Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC50 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 358] provides a summary. Key constraints identified are the site's proximity to heritage assets, proximity to an AQMA, and nearby A roads. These constraints are directly addressed through requirements, 4, 5, 7 and 8 of Policy TC40 [CD01, pg. 161], which is a heritage impact assessment and heritage design requirements, an air quality assessment and noise & odour assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC50 [CD01, pg. 161] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1(Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Development not taking place before castle car park is operational): This is to ensure the site can be considered for alternative uses without compromising parking need in the town centre. • Requirement 3 (Access via Cherry Orchard): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 4 (Heritage Impact Assessment): Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 5 (Design sympathetic to heritage assets and historic street pattern): Justified by the site's proximity to Methodists Chapel, Ebenezer House, the Church of St George, the Methodist Chape and other heritage assets as described in the site selection report [ED029, page 354] • Requirement 6 (Desk Based Archaeological Assessment): This requirement is clear and justified as a precautionary measure. It is effective in identifying and managing any potential below-ground heritage asset. • Requirement 7 (Air Quality Assessment): Required and justified in relation to the site proximity to Newcastle-under-Lyme Town Air Quality Management Area. • Requirement 8 (Noise Assessment): Justified in relation to the impact of the A52, A527 and A53

	<ul style="list-style-type: none"> Requirement 9 (Contributions Schools/ Health): Clear requirement justified by the IDP [CD16, Tables A.2], which identifies cumulative needs arising from development in the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5) <p>Additionally, a signed Statement of Common Ground between the promoter (Newcastle-under-Lyme Borough Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy TC50 being appropriate and justified [EX/NBC/04, pg. 192].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>Yes. The indicative yield of 5 dwellings is stated in Policy TC50 [CD01, pg. 156], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. As a small brownfield site in Value Area 1, it aligns with typologies shown to be unviable when standard affordable housing contributions are applied [ED004, Table 8.1]. However, Policy HOU1 only requires affordable housing contributions on sites of 10 dwellings or more. Given the yield of 5 dwellings, viability is likely improved as the site is assumed to deliver market housing only. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG [EX/NBC/04, pg. 192].</p>
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	<p>Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).</p>
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>The site is considered developable within the plan period. It was assessed as suitable, likely to become available and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 192]. This SoCG confirms the anticipated delivery trajectory for the 10 dwellings is within year 2027/28 [EX/NBC/04, Appendix 3, pg. 192, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period. Castle car park is now operational, fulfilling requirement 2.</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	<p>The Council considers Policy TC50 addresses the key site-specific matters. It provides sufficient flexibility for a small site. The Council's Schedule of Proposed Modifications [CD15 and CD15a] does not propose any changes to Policy TC50. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.</p>

TC52 Goose Street Car Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC52 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 360] provides a summary. Key constraints identified are the site's proximity to heritage assets, potential flood risk, proximity to an AQMA, and nearby A roads. These constraints are directly addressed through requirements, 4, 5, 7, 8 and 9 of Policy TC52 [CD01, pg. 162], which is a heritage impact assessment and heritage design requirements, sequential approach to flood risk, an air quality assessment and noise & odour assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC52 [CD01, pg. 162] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1(Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Development not taking place before castle car park is operational): This is to ensure the site can be considered for alternative uses without compromising parking need in the town centre. • Requirement 3 (Access via Goose Street): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 4 (Heritage Impact Assessment): Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 5 (Design sympathetic to heritage assets and historic street pattern): Justified by the site's proximity to Holy Trinity RC Church and The Barracks Workshops and other heritage assets as described in the site selection report [ED029, page 360] • Requirement 6 (Desk Based Archaeological Assessment): This requirement is clear and justified as a precautionary measure. It is effective in identifying and managing any potential below-ground heritage asset. • Requirement 7 (Sequential Approach to Flood Risk): This requirement is clear and directly reflects national guidance (NPPF Chapter 14) and Local Plan Policy SE3. It is justified and effective in ensuring flood risk is appropriately managed. • Requirement 8 (Air Quality Assessment): Required and justified in relation to the site proximity to Newcastle-under-Lyme Town Air Quality Management Area.

	<ul style="list-style-type: none"> Requirement 9 (Noise Assessment): Required in relation to the impact of the A34 and A527. Requirement 10 (Contributions Schools/ Health): Clear requirement justified by the IDP [CD16, Tables A.2 & A.3], which identifies cumulative needs arising from development in the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5). <p>Additionally, a signed Statement of Common Ground between the promoter (Newcastle-under-Lyme Borough Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy TC52 being appropriate and justified [EX/NBC/04, pg. 192].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 25 dwellings is stated in Policy TC52 [CD01, pg. 162], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. Viability was considered via the Local Plan Viability Assessment [ED004, Table 8.1]. Furthermore, site-specific factors can influence viability. Therefore, viability is considered adequately addressed at the plan-making stage. Viability is further agreed with the signed SOCG.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable, likely to become available and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 192]. This SoCG confirms the anticipated delivery trajectory for the 25 dwellings is within year 2030/35 [EX/NBC/04, Appendix 3, pg. 192, para 6.2]. Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period. Castle car park is now operational, fulfilling requirement 2.
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council considers Policy TC52 addresses the key site-specific matters, particularly the relationship with the adjacent landfill. It provides sufficient flexibility for a small site. The Council's Schedule of Proposed Modifications [CD15 and CD15a] does not propose any changes to Policy TC52. Therefore, the policy as drafted in the submission Local Plan [CD01] is considered sound.

TC71 Midway Car Park	
a) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The constraints relating to site TC71 were identified during the site selection process [ED029]. The site assessment proforma [ED029, Appendix 2, pg. 364] provides a summary. Key constraints identified are the site's proximity to heritage assets, proximity to an AQMA, and nearby A roads. These constraints are directly addressed through requirements, 4, 5, 7 and 8 of Policy TC71 [CD01, pg. 163], which is a heritage impact assessment and heritage design requirements, sequential approach to flood risk, an air quality assessment and noise & odour assessment.</p>
b) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes, the requirements set out in Policy TC71 [CD01, pg. 163] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1(Compliance with SA1): Standard requirement ensuring alignment with overarching policies, justified for consistency and effectiveness. • Requirement 2 (Development not taking place before castle car park is operational): This is to ensure the site can be considered for alternative uses without compromising parking need in the town centre. • Requirement 3 (Access via Lower Street & The Midway): This clearly defines the required access point. It is justified based on the site's location and existing highway network, as identified during the site assessment process [ED029] • Requirement 4 (Heritage Impact Assessment): Supported by the Council's Heritage Impact Assessment [ED016]. It is effective in ensuring compliance with NPPF Chapter 16 and Policy SE9 regarding the historic environment. • Requirement 5 (Design sympathetic to heritage assets and historic street pattern): Justified by the site's proximity to the Church of St Giles and the former clay Tabaco pipe factory at Lower Street and other heritage assets as described in the site selection report [ED029, page 364] • Requirement 6 (Desk Based Archaeological Assessment): This requirement is clear and justified as a precautionary measure. It is effective in identifying and managing any potential below-ground heritage asset. • Requirement 7 (Air Quality Assessment): Required and justified in relation to the site proximity to Newcastle-under-Lyme Town Air Quality Management Area. • Requirement 8 (Noise Assessment): Required in relation to the impact of the A53 and A525.

	<ul style="list-style-type: none"> Requirement 9 (Contributions Schools/ Health): Clear requirement justified by the IDP [CD16, Tables A.2 & A.3], which identifies cumulative needs arising from development in the Newcastle Strategic Centre. Effective in ensuring development mitigates its impact on local services (Policy IN1, IN5). <p>Additionally, a signed Statement of Common Ground between the promoter (Newcastle-under-Lyme Borough Council) and Newcastle-under-Lyme Borough Council agrees on the matters of specific requirements contained within Policy TC71 being appropriate and justified [Housing Land Paper and Trajectory, EX/NBC/04, pg. 207].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	Yes. The indicative yield of 100 dwellings is stated in Policy TC71 [CD01, pg. 159], based on the SHELAA assessment [ED006a]. Development mix is not specified, allowing flexibility under Policy HOU2. Viability was considered via the Local Plan Viability Assessment [ED004]. Viability is further agreed with the signed SOCG.
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The primary infrastructure requirements relate to site access and contributions to schools and health. The need for contributions is evidenced in the IDP [CD16], with delivery secured through S106 (Policy IN1).
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	The site is considered developable within the plan period. It was assessed as suitable, likely to become available and achievable in the SHELAA [ED006a]. Deliverability is further supported by an agreed Statement of Common Ground [EX/NBC/04, Appendix 3, pg. 207. This SoCG confirms the anticipated delivery trajectory for the 111 dwellings is within year 2026/27 [EX/NBC/04, Appendix 3, pg. 207, para 6.2] (local plan allocated 100). Subject to compliance with policy requirements, there are no known insurmountable constraints that would prevent development within the plan period. Castle car park is now operational, fulfilling requirement 2. A planning application was submitted and recommended for approval at planning committee on the 29 April 2025 for 111 apartments [24/00678/FUL] – a resolution to grant planning permission was given at planning committee on the 29 April 2025..
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	The Council has reviewed the representations made on the submitted Plan and has proposed a schedule of modifications [CD15 and CD15a]. For Policy TC71, amend to read ‘.... former clay tobacco pipe’ to correct a spelling error. Upon amending this criterion, the Council considers this policy to be robust and sound.

TC45 York Place	
a) Are the various requirements set out in the policy clear, justified, and effective?	<p>Yes. The requirements set out in Policy TC45 [CD01, pg. 156] are considered clear, justified, and effective.</p> <ul style="list-style-type: none"> • Requirement 1 (Compliance with SA1): This is a standard requirement ensuring development aligns with the overarching general requirements for all allocated sites, justified by the need for plan consistency and effectiveness. • Requirement 2 (access) confirms the expected access arrangement into the site, via Merrial Street • Requirement 3 (Heritage Impact Assessment) serves to examine & ensure that the development responds sensitively to the significant heritage assets in close proximity, with due regard to ED016 (Appendix A17 TC45). • Requirement 4 (Archaeological Assessment): requirement for a desk-based assessment is clear and justified as a precautionary measure standardly applied during the site assessment process [ED029]. It is effective in identifying and managing any potential below-ground heritage assets. • Requirement 5 (Delivery/Service Management Strategy) is justified based on its central location, adjacent uses, and the existing historic street pattern. • Requirement 6 (Air Quality Management Area) as the site falls within the Newcastle-under-Lyme Town Air Quality Management Area.
b) Have the site constraints been appropriately taken into account in the allocation of the site?	<p>Yes. The site selection process undertaken by the Council, detailed in the Site Selection Report [ED029, pg. 356], identifies the key constraints associated with the site and this understanding has been enhanced through the completion of relevant studies including the Local Plan Site Heritage Impact Assessment [ED016]. The built heritage and air quality constraints have been appropriately considered through the requirements set out within Policy TC45 itself [CD01, pg. 156].</p>
c) Have the indicative yield, development mix and viability considerations been adequately addressed?	<p>The application form submitted to 24/00795/FUL (considered further below at e) refers to the change of use of ground floor space from use class E(a) – display or sale of goods other than hot food, to predominantly use class E(b) - sale of food and drink for consumption mostly on the premises, with much smaller elements of use classes sui generis and E(g)(i) to carry out any administration or operational functions.</p>

	Collectively the new floorspace equates to circa 1250 square metres, as against the 1710 square metres found previously (-460 square metres).
d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?	Yes. The Infrastructure Delivery Plan (IDP) [CD16 Appendix A] identifies the prospective role that TC45 could play in yielding developer contributions for green infrastructure and community facilities as part of the cumulative development in the strategic centre (& elsewhere). The IDP also outlines the basis for these requirements and potential delivery mechanisms, primarily through developer contributions secured via Section 106 agreements and Policy IN1. The IDP is based on engagement with infrastructure providers (see CD16 Appendix C). Therefore, the infrastructure assumptions are considered realistic and supported by robust evidence. Their deliverability is linked to the development proceeding and contributions being secured.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>Site TC45 is the subject of a planning application (a resolution to grant planning permission given at planning committee on the 29 April 2025) under reference 24/00795/FUL, for the re-purposing of an existing shopping centre into commercial units at ground floor and 42 apartments on upper floors. Part demolition has already been undertaken, and this scheme (by Capital & Centric) forms part of the wider regeneration in & around Newcastle town centre.</p> <p>The site is considered deliverable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site TC45 was identified as suitable and available (subject to addressing constraints). There are no known insurmountable constraints that would prevent development within the plan period, subject to compliance with policy requirements.</p>
f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the plan sound?	TC45's policy requirements address the key site-specific constraints and necessary mitigation identified through the evidence base. The policy is considered sufficiently flexible for the nature & scale of uses proposed, setting key parameters (including access, and relevant assessments) and acknowledging its locational context. Reflecting the residential element of the submitted application (in addition to the already envisaged commercial uses), modifications [CD15a] are proposed by the Council to Policy TC45 [MOD148, MOD150 and MOD151] to illustrate the number of residential units & commercial space uses. Subject to these modifications, the policy as drafted in the submission Local Plan [CD01] is considered sound.

2. Appendix 1 – List of Reference Documents

A. The Council's evidence for Housing Allocations is set out below.

B. National Policy:

- National Planning Policy Framework (2023, 2024)
- 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

- Final Draft Local Plan [CD01]
- Sustainability Appraisal [CD03] and CD04]
- Habitats Regulations Assessment [CD05]
- DTC Statement of Compliance [CD11]
- Schedule of Proposed Modifications [CD15 & CD15a]
- Infrastructure Delivery Plan [CD16]
- Housing and Economic Needs Assessment [ED001]
- Strategic Employment Sites Assessment [ED002]
- Strategic Housing and Employment Land Availability Assessment [ED006 / ED006a]
- Site Selection Report and Appendices [ED029]
- Plan Strategy Housing and Employment Topic Papers [ED031/ED032]
- Housing and Delivery Position Statement [ED033]
- Green Belt Assessment [ED008 a – d]
- Strategic Transport Assessment [ED011]
- Strategic Flood Risk Assessment [ED013]
- Water Cycle Study [ED014]
- Landscape Character Study [ED017]
- Nature recovery network mapping report [ED020]
- Open Space and Green Infrastructure Strategy [ED022]
- Landscape and settlement character assessment study – part 1 [ED023]
- Landscape and settlement character assessment study – part 2 [ED023a]
- Heritage Impacts Assessment [ED016]
- Viability Assessment [ED004]
- Natural England Information [EX/NBC/03 a, b, c]
- Housing Land Paper and Trajectory [EX/NBC/04]
- Level 2 Strategic Flood Risk Assessment and associated notes [EX/NBC/05 and EX/NBC/06 (and associated appendices)]