



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

Matter 9 – Employment Policies and 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 Employment Policies and Allocations

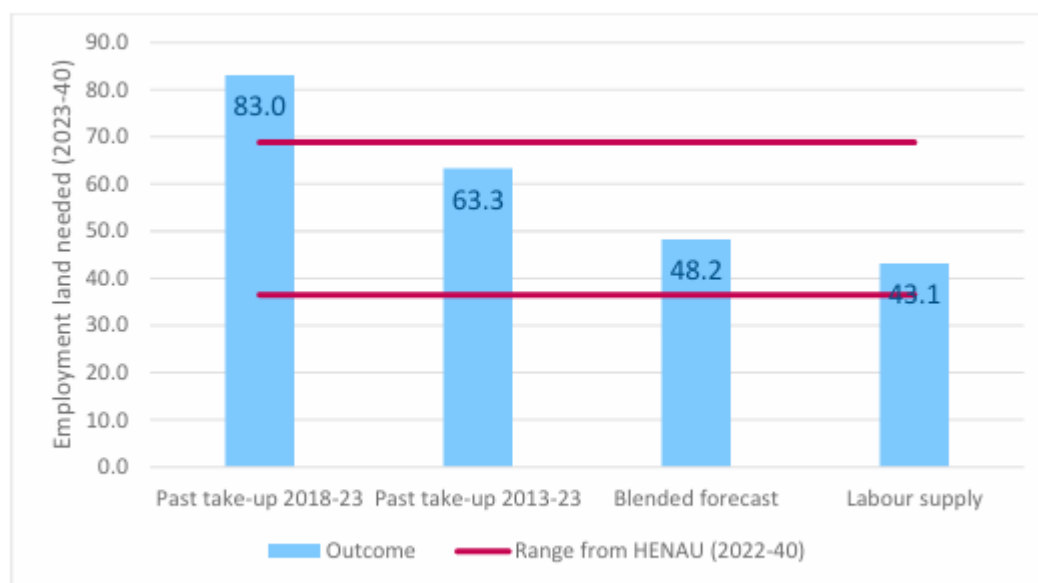
All documents referenced in this statement are listed in Appendix 1.

Issue 9 – Are the provisions of the plan in relation to the provision of employment land justified and consistent with national policy? Would the allocations be developable, deliverable, and otherwise soundly based?

Qu 9.1 How much employment land is allocated in the Plan? How have “local” and “strategic” employment needs been identified and quantified and how does the Plan seek to address these?

- 9.1.1 Policy PSD1 (“Overall Development Strategy”) in the Final Draft Local Plan [CD01, pg. 13] states the provision of a minimum of 63 hectares employment land over the Plan Period (2020-2040).
- 9.1.2 In forming this policy position, it is acknowledged that the Housing and Economic Needs Assessment (“HENA”) [ED001, para 6.16] provides for a range of circa 43-83 hectares of employment land being needed over the period from 2023 to 2040, which is based on the interpretation of forecasting, the take up of employment land and other relevant data, with the full range of figures tested through the Sustainability Appraisal [CD03 para 5.4.7 – 5.4.12]. Please also refer to the Council's response to Matter 4, question 4.1(b) on the role of forecasts for influencing the level of economic growth and ambition in the Local Plan.
- 9.1.3 The technical rationale for the circa 43–83-hectare range of employment land requirements is provided in the HENA [ED001, para 6.16] which concludes that the forecast scenarios can be seen to imply a need for between 43.1ha and 83.0ha of employment land in Newcastle-under-Lyme over the period from 2023 to 2040.
- 9.1.4 This range was slightly wider than that reported in the 2023 Housing and Economic Needs Assessment (“HENA”) (36.5-68.8ha) [ED001a, para 22] and increases both its upper and lower end, despite covering a slightly shorter period. This is primarily due to the omission of an unadjusted baseline forecast – with a scenario linked to Cambridge Econometrics’ producing the lowest estimate of need in the 2023 HENA (36.5ha) [ED001, para 6.16] – and the increased take-up seen over the past five years up to 2023, relative to the slightly earlier period considered previously, which served to elevate the upper end of the range.
- 9.1.5 Figure 6.2 [ED001, pg. 39] summarises the analysis, with the blue bars showing the forecast need under each of the scenarios in the 2024 HENA [ED001] and the red lines showing the previous range of need from the 2023 HENA [ED001a]:

Figure 6.2: Updated Range of Employment Land Requirements



Source: Turley analysis

- 9.1.6 The Council considers that the figure of 63 hectares is appropriate where it accounts for the historic take-up of land, as referenced at paragraph 6.65 of the HENA [ED001] and paragraph 5 of ED039, whilst meeting the forecasted need for employment land in the HENA [ED001]. The Sustainability Appraisal also appraises the employment land growth options [CD03, paragraph's 5.4.7 - 5.4.12] and sets out the reason for selection of the chosen employment land figure [CD03, paragraph 5.4.12]. The Council considers that providing a single employment land figure in the Plan is appropriate to provide certainty, rather than present a range of employment land requirements in Policy PSD1 (Overall Development Requirements) [CD01, pg. 13].
- 9.1.7 The Strategic Employment Sites Assessment [ED002] acknowledges that the West Midlands Strategic Employment Sites Study [ED036] has consistently identified an unmet demand for strategic employment sites, with North Staffordshire an area in which suitable sites could be identified. The report [ED002] considers wider sub-regional drivers, the need for land and market views on demand and need alongside other factors and also considers how the provision of employment land will enable Newcastle-under-Lyme to maintain its position for manufacturing and logistics in the local area (further consideration included in the response to Qu 9.3)
- 9.1.8 Table 2 of the Employment Land Clarification Note [ED039] details the anticipated total employment land supply. This is formed from an aggregate of existing supply and allocations proposed in the Plan.
- 9.1.9 Paragraph 15 of the Employment Land Clarification Note [ED039] recognises that the existing employment land supply has qualitative and quantitative deficiencies (detailed further in the HENA [ED001 (Table 6.9, pg. 42 & Appendix 2, pg. 84)] that need to be addressed through the Local Plan. The Council considers that the supply of sites

detailed in Table 2 demonstrate a portfolio of individual employment sites that cater for different development scales, geographies and end-users, that it is considered will address the identified requirements over the Plan period. This includes providing for the emerging sector demands for industries such as logistics, and ensuring adequate choice & flexibility and a quality of the offer in the market, the need for which are raised at numerous points in the HENA [ED001, for example para 6.61]. In line with paragraph 87 of the NPPF (December 2023) the supply also recognises that there are locational requirements of different sectors, including for storage and distribution at a variety of scales and in suitably accessible locations.

- 9.1.10 The identified supply includes the allocation of strategic sites AB2 (Land at Junction 16) and KL15 (Land at Barkers Wood, Keele). Paragraph 13.8 of the West Midlands Strategic Employment Sites Study [ED036] identifies that in general terms, sites can respond to local as well as strategic needs, given that local trends feed into overall strategic needs. This is also recognised in the HENA [ED001, paragraph 7.3] where it is identified that the informing forecasts suggest the borough playing a more strategic role than it has done previously in anticipating a virtual trebling of the historic growth trend in the transport and storage sector (capturing logistics).
- 9.1.11 These sites will provide resilience in the supply of employment land supply ensuring that local employment land needs are met during the plan period and performing a key strategic role in supporting sub-regional economic growth. The study comes to conclusions around the strategic sites at Land at J16 of the M6 (AB2) [ED002 (para's 12.17-12.22)] and KL15 (ED002 (para's 12.23-12.29 & 12.36)).
- 9.1.12 A location at junction 16 of the M6 is identified in the study as a road-based opportunity area in the West Midlands Strategic Employment Sites Study [ED036, paragraph 14.21, figure 14.1 and table 14.1].
- 9.1.13 The expansion of Keele University facilitated through allocation KL15 will also address very specific requirements that help consolidate the economic advantages of proximity to a higher education institution. Such support to university and campus operations, as well as providing land to enable inward investment by R&D/ knowledge industries that want to take advantage of university research programmes and a highly skilled workforce, will yield significant benefits for the Borough and beyond. The longer term (to 2040) ambitions for growth and student number increases considered further as part of Matter 4 – The Housing Requirement - Qu 4.4 [EX/INS/03] are also recognised.
- 9.1.14 The Duty-to-Co-operate Statement of Compliance [CD11, Appendix 13] notes that Staffordshire County Council agrees through a Statement of Common Ground that there is a need to allocate employment land in the Borough and there is a need for at least two strategic employment sites. The Staffordshire County Council Economic Strategy, referred to in para's 5.21 – 5.23 of the Strategic Employment Sites Assessment [ED002], also notes that the A50 / A500 corridor is considered one of the most important locations for economic activity within the county and is vital in connecting residents to jobs.

9.1.15 The Council therefore considers that having a single minimum employment need figure (63ha) representing both local and strategic needs is justified and robust. Having a single figure, rather than a range, provides for more certainty in the Local Plan. This extends to the wider arguments surrounding net developable area [ED039 (para 9)] and the timeframes for delivery of the strategic employment sites [ED039 (para 17)].

9.1.16 In setting the wider context to the employment land supply issue, it is worth noting that whilst Newcastle under Lyme Borough and Stoke on Trent City share the same functional economic area, the Councils agree that Newcastle under Lyme provides for its own employment land requirement through the preparation of its Local Plan. Nor conversely has Stoke on Trent City Council made a request to Newcastle under Lyme to accommodate any unmet employment land need they may have [CD11, pg. 9 & Appendix 2).

Qu 9.2 Is the identified supply of local employment land justified in order to provide for future employment needs in the borough?

- 9.2.1 Yes. Section 6 of the HENA [ED001, pgs. 34 - 55] presents the rationale for the employment need against which the identified supply should be measured. This includes Table 6.9 [ED001, pg. 42] which provides an initial comparison between the identified existing supply of land and the scenarios of need. It indicates that there is insufficient land to support a continuation of past take-up of 2013-2023, and that the scale of shortfall has grown since publication of ED001a (Table 5.9) in March 2023. ED001 (Appendix 2) provides a wider background explanation of updated employment land supply, considering both quality and quantity factors.
- 9.2.2 The employment land clarification note [ED039] further updates the quantitative calculations contained in Appendix 2 of ED001. Tables 1 and 2 of ED039 collectively identify 6 non-strategic sites with a cumulative gross development area of 55.94ha. This is higher than the 48.9ha identified in Appendix 2 of ED001 because of variations in the site areas of individual sites accounting for the Council's further consideration of the remaining developable areas. This supply includes three sites which formed allocations in the earlier adopted Local Plan (forming part of the 2011 Saved Policies) and are now (following their re-evaluation in CD03 etc) proposed to be 'carried forward' as allocations in the emerging Local Plan, (referenced KL13 & 2020-N32 in ED001; CT20 & 2020-N23; BW1 & 2020-N12), see para 7 of ED039 also.
- 9.2.3 The other three sites are considered to remain as part of the existing supply figure detailed in Table 1 of ED039; (1) Chatterley Valley (west of mainline) (BW19 & 2020-N13), which whilst acknowledging its local plan allocation (as part of the 2011 Saved Policies – Policy E2), is to be developed for such uses imminently forming part of the Ceramic Valley Enterprise Zone, with outline planning permission and ground & infrastructure works ongoing; (2) Linley Road, Kidsgrove (BL22 & 2020-N7) which is vacant land (albeit with a current active use for vehicle storage & acknowledging the prospective delivery challenges highlighted in Appendix 2 – including Table 2.4 - of ED001) within an existing employment site, and; (3) Silverdale Business Park (SP9 & 2020-N47) with an extant permission (although question marks have been raised as to this having now lapsed).
- 9.2.4 Each of the respective sites detailed in Table 1 and Table 2 of the employment land clarification note [ED039] has been considered within the site selection report [ED029] (including Appendix 1 and Appendix 2), as appropriate. Similarly, depending on the site's status (i.e. being part, or otherwise, of the existing supply - Table 1 of ED039) they have also been appraised in the Sustainability Appraisal [CD03, table 6.2 and Appendix H].
- 9.2.5 As considered in the response provided to question 9.1, there is the potential for the two strategic allocations to in part address the employment need set out in ED001 & provided for in Policy PSD1 [CD01]. The relative merits of these sites have been examined within documents including the Strategic Employment Sites Assessment [ED002], the Sustainability Appraisal [CD03] and in the Site Selection Report [ED029].

Qu 9.3 In relation to strategic employment needs is the amount of land allocated for strategic employment needs justified and consistent with national policy?

- 9.3.1 The Strategic Employment Sites Assessment [ED002 and ED002a] assessed the need for strategic employment sites in Newcastle under Lyme. Paragraph 1.3 of ED002a states “The overall objective of the study update is to identify the need for strategic employment land across the borough of Newcastle-under-Lyme for the period 2020 to 2040, and justify the inclusion of (a) strategic employment site(s) for allocation.”
- 9.3.2 Mace Ltd, supported by Icen Projects Ltd, Knight Frank and MDS Transmodal produced the West Midlands Strategic Employment Sites Study 2023 (WMSESS) published 2024 [ED036].
- 9.3.3 This report attempts to look across the next two decades and economic cycles (to 2045) to provide land-based recommendations which are designed to support the continued economic growth and success in the West Midlands. It provides recommendations on the overall number and type of strategic sites required in the study area.
- 9.3.4 The market evidence points to a strong need for additional investment sites to be brought forward across the region to support growth [ED036, para 1.11, 14.7]. It believes there might be a case for more dedicated B2 investment area in the Staffordshire area notably Stoke / Stafford. There are already dedicated areas for investment here of a non-strategic scale. In reviewing ED036, it is felt that that AB2 meets all the criteria for a Strategic Site in this study – summarised at para 14.32, pg. 211 - namely:
- Good connections with the strategic highway network (for road)
 - Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha
 - Is or can be served from an electricity supply grid with sufficient capacity.
 - Is accessible to labour and includes a clear sustainable transport solution for the local road network.
 - Is located away from incompatible land-uses.
 - The ability to deliver high-bay warehousing
- 9.3.5 The principle of a strategic employment site at Junction 16 [reference AB2] has been considered through the site selection report [ED029, pg. 102]. As already stated, the site has also been considered through the Strategic Employment Sites Assessment [ED002] which has reviewed the principle of allocating the site and informed the site selection report process. The site has also been considered through a raft of appraisal and evidence -based documents.
- 9.3.6 The strategic employment site at Junction 16 of the M6 (currently Green Belt) provides a sub-regional logistics focused employment park and would accommodate development which yields significant benefits, which are explored further below.
- 9.3.7 Firstly, it meets a sub-regionally identified logistics need, as evidenced in part through the Strategic Employment Sites Assessment [ED002] and the West Midlands Strategic Employment Sites Study [ED036, table 14.1, pg. 208] which has identified a potential

need for a strategic scale B8 logistics provision that should be addressed through Local Plans produced within the sub-region [ED002, para 5.20].

- 9.3.8 The provision of a new strategic site(s) will enable the Newcastle-under-Lyme / Stoke-on-Trent functional economic area to maintain its position as the best manufacturing and logistics base in its area of influence [ED002, para 12.1].
- 9.3.9 The Strategic Employment Sites Assessment identifies that there is a clear market aspiration for a well-located, high-quality site along the M6 Corridor between Warrington and the Black County. There is a need to provide for a competing offer with locations in the North West / West Midlands for investment opportunities with a pipeline of new, well located development to meet the needs of occupiers [ED002, Para 12.2].
- 9.3.10 There is significant demand for industrial and logistics space in the West Midlands market [ED002, para 12.6], particularly in the M6 corridor south of Warrington [ED002, para 12.8]. There are challenges in balancing supply and demand in the market with a pressing need to deliver modern and spacious employment space in the local area [ED002, para 12.12]. Demand is being suppressed in the functional market area, due to an existing lack of sites, that this allocation would seek to address [ED002, para 9.17]. Logistics, manufacturing, ceramics and life sciences are all economic growth sectors in the Midlands Engine Strategy for Growth [ED002, pg. 46]. The site is also supported by the Chamber of Commerce.
- 9.3.11 According to the Council's evidence, from an occupier perspective, there are advantages to being located in the functional market area including access to a strong pool of labour, close proximity to the M6 and A500/ A500/ A34 strategic corridor, which in turn gives it rapid access to local markets, as well as Derby and the wider East Midlands. These are all positive for investors and they are also attractive to potential future occupiers [ED002, para 9.19]. The Staffordshire County Council Economic Strategy identifies the A50/A500 corridor as one of the most important locations for economic activity within the County [ED002, 5.21]. A signed Statement of Common Ground with the County Council includes support for a strategic employment site in the Borough [CD11, Appendix 13, paragraph 4.1].
- 9.3.12 The site (AB2) will provide facilities for alternative Heavy Goods Vehicle (HGV) parking, in line with evidenced requirements, set out in the National Highways Lorry Park Demand Assessment, demonstrating the need for such provision. Newcastle-under-Lyme has been identified as one of the top 10 local planning authorities by unmet demand for HGV parking [ED037, pgs. 33, 35].
- 9.3.13 The site is considered viable, promoted by a landowner who has confirmed that there are no legal or ownership impediments to the development of the allocated site [EX/SCG/05]
- 9.3.14 The site will provide a number of skilled jobs across a range of sectors, providing long term employment and providing economic benefits for the local area and sub-region [ED002, para 4.18].

- 9.3.15 In line with the NPPF (December 2023), the site provides for specific locational requirements of storage and distribution operations at a large scale in a key location on the M6/A500 [NPPF, paragraph 87] and provides for sufficient overnight lorry parking facilities [NPPF, paragraph 113].
- 9.3.16 KL15 provides for an extension to the science park at Keele University. This is part of the 'Golden Quadrangle' of leading research and teaching universities. It has renowned expertise in Life Sciences, Renewable Energy and ICT. These are all key Economic Sectors for the region, with broad policy support from the Levelling Up White Paper, the Midlands Engine for Growth and the Staffordshire Economic Strategy.
- 9.3.17 The University has prepared a Masterplan and Economic Impact study as part of its University Growth Corridor initiative. Similarly, the EIA has been updated and a Capital Management Plan is understood to be in progress [ED002, para 3.4]. The considerable inward investment that has taken place in recent times is testament to its attractiveness to knowledge intensive industries. Its competitors for requirements for Life Sciences or Environmental research should be seen typically as other University Science Parks, rather than sites elsewhere in the functional economic market area.
- 9.3.18 ED002, para 7.16 states the importance of the site in local and regional economic development, and the growing importance of universities as centres of excellence for the 'spin-off' and 'spin in' of knowledge related industries, taking advantage of on-campus research and also the ready availability of a large, highly skilled workforce [ED002, para 10.11].
- 9.3.19 As per AB2, in line with the NPPF, para 87 (December 2023), the site (KL15) provides for specific locational requirements, in this case, making provision for clusters or networks of knowledge industries, especially when considered in aggregate to the adjacent Science and Innovation Park at KL13, and the sites being collectively based around the anchor institution of Keele University.

Qu 9.4 Have these allocations had appropriate regard to the potential wider strategic impact of the development?

- 9.4.1 Yes. Numerous documents that form part of the evidence base have contributed to the understanding of the potential wider strategic impacts of development.
- 9.4.2 Detailed Green Belt assessments and proformas for both sites AB2 (referenced as AB2A owing to the site's amended boundaries) and KL15 have been undertaken within the Green Belt Assessment [ED008]. Page D-0 states that site AB2 makes an overall moderate contribution to the purposes of Green Belt, with KL15 (pg. D-27) assessed as making a weak contribution. Further evaluation by Ove Arup is made with completion of detailed site proformas presented in pages F3 – F5 (AB2) and F75-F77 (KL15). This includes recognition for AB2 that owing to its proximity to the strategic road network, the site may be suitable for employment use.
- 9.4.3 Strategic Transport implications have been analysed through the Strategic Transport Assessment [ED011]. This includes modelling - Model Run 2, Section 8.3 for AB2 and Model Run 4, Section 8.5 for KL15 – as well as a consolidated Model Run 5 (Section 8.6) for all allocated sites which presents a final selection of mitigation measures:
- AB2 - bus provision be provided connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe, with it assumed that the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services.
 - For Keele (including KL15) - a new link road running between University Avenue/Barkers Wood Road to Whitmore Road. The link road will be a 30mph 7.3m wide road connecting the A525 with the A53 to provide an additional route to distribute trips and relieve pressure on the A525. As well as this, a new circular bus service serving Newcastle-under-Lyme bus station, Keele University, KL15, KL13, TB19, and SP11 sites via Keele Road, the new link road and Whitmore Road.
- 9.4.4 Through dialogue with Natural England [EX/NBC/03], further work on quality has been undertaken [EX/NBC/03a], which has particular significance for site AB2, allied to interpretation of Air Quality Modelling Data for the Components of the Midlands Meres and Mosses (Phase 2) Ramsar Site [EX/NBC/03b], whose outputs have collectively culminated in the signing of a Statement of Common Ground [EX/NBC/03c and EX/SCG/03], whereby a form of words has been agreed by parties alongside the completion of the final Air Quality HRA [EX/NBC/03b]. Natural England concur with the conclusion of no adverse effect on integrity with regards to Air Quality through the outcomes of the HRA, including the Air Quality Interpretation update.
- 9.4.5 Flood risk has also been robustly assessed. This is especially significant for site AB2, which is explicitly considered as part of [EX/NBC/05], with it passing the sequential test (Appendix 1) and it recognised that whilst the site is affected by fluvial and surface water flooding, the majority of the site is not shown to be at flood risk. These conclusions are based on the outputs of [ED013]; [EX/NBC/06]; [EX/NBC/06a]; [EX/NBC/06b];

pEX/NBC/06c(i)]; [EX/NBC/06d(i)]; [EX/NBC/06d(ii)]. KL15 has a minimal risk from flooding as demonstrated by [EX/NBC/06a] and [EX/NBC/06b].

- 9.4.6 The Site Selection Report [ED029 (para 2.20)] illustrates the breadth of evidence base documents that have been used to inform individual site assessments. In isolation and collectively, they have aided the strategic understanding of the impacts of development. For instance, the infrastructure delivery plan [CD16] gives a clear picture of prospective infrastructure requirements to mitigate the impacts of development, and which are considered further within the Council's response to Qu. 9.6 for AB2 and KL15.
- 9.4.7 Discussions with Neighbouring Authorities in compliance with the Duty to Cooperate [CD11] are also significant. Stoke on Trent City Council (Appendix 2), Stafford Borough Council (Appendix 6), Staffordshire Moorlands District Council (Appendix 8) and Shropshire Council (Appendix 10) have not expressed any objection to the strategic employment allocations through stated areas of disagreement as part of the signed Statements of Common Ground. The stance of Cheshire East Council, in terms of their view that AB2 should be removed from the Plan, or in the event that the Inspector is minded to retain the site, request that a number of modifications be made to Policy AB2 [EX/SCG/04 and CD11 (Appendix 4)] is also recognised.
- 9.4.8 The Strategic Employment Sites Assessment [ED002] consolidates information on the sub-regional needs and drivers, including alignment with [ED036], the collective need for land of the nature identified across the functional economic market area—accounting for the historic focus of such needs in Stoke on Trent, and market views on demand / need from relevant sectors and establishment of the right type of employment land required for allocation. Chapter 4 [ED002] gives an oversight of the views (positive and negative) expressed to date (as at the time of publication) by consultees, with a more detailed assessment of the potential sites (including AB2 and KL15) undertaken (concluded in Section 12) to determine relative performance and justification for the allocation of strategic employment sites.

Qu 9.5 How were employment sites selected? What factors led to their allocation? Are they based on up-to-date evidence? Were they selected in comparison with possible alternatives using a robust and objective process?

- 9.5.1 The Plan Strategy Employment Topic Paper [ED032, paragraphs 5.40 – 5.42]] presents a narrative on the approach to selecting sites. This includes regard being had to the Strategic Housing and Employment Land Availability Assessment [ED006a], Site Selection Report [ED029] and the Sustainability Appraisal [CD03], alongside the numerous other relevant evidence base documents as listed in the Site Selection Report [ED029, paragraph 2.20], which extend to consideration of issues such as Green Belt [ED008], infrastructure [CD16], landscape [ED023 and ED023a] and viability [ED004].
- 9.5.2 Para 2.1 of the Site Selection Report [ED029] further highlights the broad stages involved, which include sourcing the potential sites from the Strategic Housing and Economic Land Availability Assessment (SHELAA) [ED006a], Site Assessment using Sustainability Appraisal [CD03], Habitats Regulations Assessment [CD05] and appropriate relevant evidence, allied to public consultation and input from statutory consultees [CD06a, CD06b and CD11].
- 9.5.3 The potential future supply and qualitative factors of employment land are also considered as part of the Housing and Economic Needs Assessment [ED001 paragraphs 6.31 – 6.35]. The status of site BW19 (Chatterley Valley, West of Mainline) is justified in remaining part of the existing supply (ED039, Table 1 and considered in Table 2.4, ED01) pending its build out, with it acknowledged that this may take place in the near term.
- 9.5.4 The consideration of market attractiveness and deliverability which informed the relevant aspects of the HENA [ED001] was proportionate to the level of detail necessary. Each site referenced in the HENA was visited by a professionally qualified Planning and Development Surveyor (MRICS, MRTPI). The site visits thoroughly assessed deliverability – including topography, site conditions, access and location relative to strategic infrastructure and roads. Where available, the surveyor reviewed documents relating to the sites.
- 9.5.5 The work was informed by a commercial market review using published data of recent transactions on a local, sub-regional and regional basis; also taking account of the current market in the North-West region and any A50 sites in Derbyshire. Aspinall Verdi (who produced ED002) also consulted with local agents active in the employment land market as well as specialist industrial and logistics agents based in Manchester and Birmingham.
- 9.5.6 Site Proformas were prepared to ensure consistency of reporting with comparative scoring use to quantify the analysis, with summaries of the results of the site assessment provided in Appendix 2 (Table 2.1 and Table 2.3) of ED001.
- 9.5.7 This scoring system was also followed for the Strategic Employment Site Study [ED002a], albeit for these sites further work was undertaken to support their assessment. This included engagement with the site promoters and/or their planning

agents. These being St Modwen Developments (now Indurent) and their advisors for AB2, Keele University's Estates Director for KL15 and Harworth with their planning agents for TK30 (an omission site). These meetings were a combination of online and in person. The parties supplied additional reports/ plans/ evidence in the days after.

- 9.5.8 For those sites that form the existing supply as presented in the Employment Land Clarification Note [ED039, Table 1], owing to reasons of the site's status, primarily as having extant planning permission, these sites are, in effect, considered pipeline schemes (albeit their contributions may be limited as stated elsewhere in Matter 9 – e.g. 9.2.3), and have accordingly not been evaluated as part of the Sustainability Appraisal [CD03].
- 9.5.9 The constituent sites within the future total employment land supply [ED039 (Table 2)] have each been fully evaluated to determine their relative merits, including where appropriate contributions to the purposes of green belt. This includes a detailed proforma for each site in the site selection report [ED029] (Appendix 2) – CT20 pg. 166-167; KL13 pg. 204-205; BW1 pg. 150-151; KL15 pg. 206-208; AB2 pg. 102 -104. For sites in the Site Selection Report, officers in the planning policy team visited sites as part of the site selection process.
- 9.5.10 For sites CT20, KL13 and BW1, it is acknowledged that these have formed allocations in the earlier adopted Local Plan (forming part of the 2011 Saved Policies). However, it was felt expedient to assess them against the latest evidence base on their own individual merits. For example, BW1 has been evaluated in [EX/NBC/05] and [EX/NBC/06c(iv)] which aids the justification of the sequential approach to flood risk expressed in Policy BW1.
- 9.5.11 In the case of sites KL15 and AB2, in their role as strategic employment allocations, they have been examined also within [ED002]. The potential of each of the (three) sites (detailed in 9.5.8) to fulfil the role of strategic employment sites was analysed and benchmarked against each other in terms of market attractiveness, physical characteristics, and sustainability. This extends to conclusions in Section 12 on the value of these proposals, both within and beyond Newcastle under Lyme, and their anticipated deliverability.
- 9.5.12 Reflecting on each of the various aspects outlined and the evidence base in the Local Plan, sites were selected through the site selection process via the site selection report [ED029] and sustainability appraisal [CD03] using a robust methodology. The contemporary evidence base (typically produced within the last two years) adds confidence in the appraisal, outputs and employment land position that has been presented.

Qu 9.6 Are the sites allocated for employment sound, and in particular for each of the sites listed below:

AB2 Land at Junction 16 of the M6	
a) Are the various requirements set out in the policy clear, justified and effective?	<p>Yes, the requirements set out in Policy AB2 [CD01, pg. 112] 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. For this site, MOD130 emphasises the need for a comprehensive masterplan led approach to the site. • Requirement 2 (access) clearly defines the required access point, justified through the site selection report [ED029, pg. 102] and tested through the Strategic Transport Assessment [ED011, Section 9] • Requirement 3 (Lorry Parking) – confirms the need for heavy good vehicle parking on the site and for agreement of the operation requirements with National Highways / Staffordshire County Council. This is justified in the site selection report [ED029, pg. 102] and also the National Highways Lorry Park Demand Assessment where Newcastle-under-Lyme is identified as a particular critical convergence point for freight and logistics distribution and identified in the top 10 of local authorities with the worst lorry parking issues [ED037, pg. 33, 35 & 38]. MOD 130 is required in response to comments from Staffordshire Police. • Requirement 4 (sub-station) is justified to meet the energy needs of the development. • Requirement 5 (solar technology) is linked to requirement 4 in respect of supporting energy generation on the site. • Requirement 6 seeks to support the sustainability credentials of the site and is consistent with the Policy approach set out in CRE1: Climate Change • Requirement 7 seeks to ensure that appropriate mitigation is provided for to take account of the impacts of the strategic site. MOD131 is required, following engagement with National Highways, to provide for a microsimulation model at planning application stage. • Requirement 8 is justified as being required, following the site selection report [ED029, pg102] recognising that measures are likely to be required to ensure impacts on local amenity are minimised as any development proposals come forward.

	<ul style="list-style-type: none"> • Requirement 9 is required in recognition of the potential landscape impacts of the proposal and how these need to be assessed and mitigated. MOD137 is required following further engagement with Cheshire East Council. • Requirement 10 is justified in recognition of the site's relationship with the Green Belt and to ensure defensible boundaries to the sites are maintained and strengthened. It also reflects comments made in the Green Belt Assessment for the site [ED008, pg. F-5] • Requirements 11 & 12 are clearly stated and reflect the outcomes of the Council's Heritage Impact Assessment [ED016, Part 1, Appendix A3]. • Requirement 13 is important to support the sustainability credentials of the site. The policy requires to the provision of a travel plan. The policy wording has been enhanced by MOD 081, MOD 132 & MOD133 to ensure that the site provides a public transport strategy and that the Travel Plan considers routing to areas that minimise impacts on the Black Firs and Cranberry Bog SSSI. • Linked to the above need for a travel plan, Requirement 14 seeks to support existing pedestrian and cycle routes on the site and that these should be safe and secure. • Requirement 15 seeks to support the provision of open space within the northern area of the site. • Requirement 16 provides for an integrated surface water drainage strategy as identified through the Strategic Flood Risk Assessment and Site Selection Report [ED029, pg102]. • Requirement 17 is consistent with criterion 5 of Policy EMP1 Employment in the Local Plan and seeks to support employment opportunities at the site • Requirement 18 is required to ensure that the site is maintained during its operational life. • Requirement 19 supports a utilities masterplan to recognise its scale. MOD082 is required following further discussion with United Utilities. • Requirement 20 recognises the sites location and proximity to a gas distribution pipeline and any other infrastructure that runs through or adjacent to the site.
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. 102], identified the key constraints associated with site. This understanding has been enhanced through the completion of relevant studies including the Strategic Transport Assessment, Green Belt Assessment, Strategic Flood Risk Assessment, Infrastructure Delivery Plan and other elements of the evidence base. The constraints have been appropriately considered through the requirements set out within Policy AB2 itself [CD01, pg. 112/113].</p>

<p>c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?</p>	<p>Yes, the employment land clarification note [ED039] clearly outlines the employment land requirements of the site. The site is circa 80 hectares in total (gross area). As outlined in the introduction of the site in the Local Plan [CD01, pg. 112] it is anticipated that circa 220,000 sqm of employment land floorspace will be delivered on the site. Constraints and off site impacts have been adequately addressed through the policy criterion outlined above and through evidence base documents including but not exclusive to:-</p> <ul style="list-style-type: none"> • The Strategic Transport Assessment [ED011] which has modelled the transport implications of the site, enhanced by further work undertaken post submission to resolve the concerns from Natural England [EX/NBC03a, b,c] • The infrastructure delivery plan [CD16, 3.71 – 3.75, Appendix A] • Site Specific Landscape and Visual Appraisal [ED017, pg68] • The Sustainability Appraisal [CD03] and the Habitats Regulations Assessment [CD05 & EX/NBC/03b]. <p>The promoters themselves are experienced, well-resourced organisations with considerable credibility in the property industry. They are experienced in delivering the highest quality developments for exacting end users. Masterplans have been prepared by suitably experienced architects/ landscape designers on behalf of the promoters. These provide detailed analysis of the potential floorspace that can be provided on the site.</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 key infrastructure requirements are set out in the policy requirements for the site. The need for this infrastructure to support the site 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 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>The Strategic Employment Sites Assessment [ED002 Para 4.15 and 4.16] highlights significant new work done to alleviate the traffic concerns expressed by locals and the neighbouring Council (Cheshire East) for AB2. This includes:</p> <ul style="list-style-type: none"> - A 200-space lorry park to take vehicles off the A500. This is supported by the Road Haulage Association. - A Public Transport Strategy to improve cycle and bus routes from nearby settlements to the location.

	<ul style="list-style-type: none"> - Highways improvements and betterment to the junction – all with ongoing consultation with Highways England. - Iterative evolution of the design, including a new drainage strategy. - A strategy to ensure compliance with Biodiversity Net Gain legislation.
e) Is there evidence that the development of the allocation is viable and developable during the plan period?	<p>The site is considered deliverable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site AB2 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. There is a statement of common ground [EX/SCG/05] with the site promoter that confirms that the site is deliverable and includes a timescale for estimated completion. The Strategic Employment Sites Assessment [ED002, Chapter 11] affirms also that AB2 remains a viable proposition. It is a premium location in North Staffordshire, and it is likely that the future occupiers will have strong covenant strength.</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>There are a number of modifications proposed to this policy, principally as a consequence of signed statements of common ground with relevant parties. The modifications are referenced in the response to criteria A of this table and are included in the proposed main modifications table [CD15 & CD15a].</p> <ul style="list-style-type: none"> • MOD080 • MOD081 • MOD082 • MOD130 • MOD131 • MOD132 • MOD133 • MOD137 <p>These modifications are necessary to make the Plan sound.</p>

BW1 Chatterley Valley	
a) Are the various requirements set out in the policy clear, justified and effective?	<p>Yes, the requirements set out in Policy BW1 [CD01, pg. 118/119] 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 (access) confirms the expected access arrangement into the site, via Lowlands Road Requirement 3 (coal mining / land contamination) assessments are required given that part of the site is in a coal authority risk area [ED029, pg 150] Requirement 4 (Flood Risk) is justified as part of the site is impacted by surface water flooding Requirement 5 (ecological buffers) are considered appropriate given the sites proximity to Bathpool Park (Site of Biological Importance) Requirement 6 (Minerals Safeguarding Area Assessment) is required given the site being impacted by a mineral safeguarding 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. 150], identified the key constraints associated with site.</p> <p>Key constraints identified include the site's proximity to a coal authority high risk area and mineral safeguarding area with associated potential land contamination issues. These matters have been appropriately considered through the policy associated with site BW1[CD01, pgs. 118/119].</p>
c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?	<p>The site is allocated for up to 6.4 hectares of employment land. The constraints identified through the site selection report [ED029] and Strategic Housing and Employment Land Availability Assessment [ED006] have been appropriately considered through the requirements set out within Policy BW1 itself [CD01, pg. 118/119]. The site also had a previous planning approval for employment uses.</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 set out in the policy requirements for the site. The need for this infrastructure to support the site 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 and Policy IN1. The IDP is based on engagement with infrastructure providers (see IDP Appendix C). Therefore, the</p>

	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?	There is a signed statement of common ground with the site promotor [EX/SCG/06] 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?	There is a modification proposed for the policy [CD015a, MOD140] that confirms the requirement for the need for a site-specific flood risk assessment at planning application stage which includes a detailed hydraulic model. This is to reflect the outcomes of an agreed statement of common ground with the Environment Agency.

CT20 Rowhurst Close	
a) Are the various requirements set out in the policy clear, justified and effective?	<p>Yes. The requirements set out in Policy CT20 [CD01, pg. 166-167] 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 Apedale Road/Watermills Road. Requirement 3 (Flood Risk) is justified as part of the site is impacted by surface water flooding [ED013 & accompanying maps]. Requirement 4 (Contaminated Land Assessment) reflecting its historic former landfill use. Requirement 5 (Consideration of adjacent land uses) owing to a number of residential properties abutting the site on Apedale Road. Requirement 6 (coal mining / land contamination) assessments are required given that the site is in a coal authority risk area [ED029, pg. 166]. Requirement 7 (Biodiversity Alert Site) given the proximity to Apedale Disused Tips.
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. 166-167], 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 CT20 itself [CD01, pg. 118-119].</p>
c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?	<p>The site is allocated for up to 8.88 hectares of employment land. The constraints identified through the Site Selection Report [ED029, pg. 166-167] and Strategic Housing and Employment Land Availability Assessment [ED006] have been appropriately considered through the requirements set out within Policy CT20 itself [CD01, pg. 118-119]. The site also forms part of a wider established employment area that was identified for such uses within the saved policies (2011 – Policy E9) of the 2003 Local Plan.</p>
d) Is there robust evidence that the assumptions regarding the	<p>Yes. The key infrastructure requirements are set out in the policy requirements for the site. The need for this infrastructure to support the site is evidenced in the Infrastructure Delivery Plan (IDP) [CD16 Appendix A]. The IDP outlines the basis for these requirements and potential delivery mechanisms,</p>

infrastructure required for the development are realistic and that it will be deliverable?	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 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?	The site is considered deliverable within the plan period. The SHELAA [ED006a] assessed potential sites based on their suitability, availability, and achievability. Site CT20 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. CT20 is also referred to as part of the existing employment land supply in ED001 (Table 2.1, Table 2.3 and pg. 90) with it anticipated that build out will occur in the near term.
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?	There are no omissions in CT20, and it is considered that through the uses that may comprise development on the site (i.e. offices, research and development, industrial processes, general industrial, storage and distribution and open storage), Policy CT20 is sufficiently flexible.

KL13 Keele Science Park (N.B. This site is also considered as part of Matter 6 Housing Allocations - qu 6.3)	
<p>a) Are the various requirements set out in the policy clear, justified and effective?</p>	<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 give consideration to the alignment of a 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) • 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

	<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 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 • Requirement 14 (Financial Contributions) to mitigate the impacts of the development (including the residential element).
b) 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, pgs. 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.
c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?	The site is allocated for up to 11 hectares of employment land. The constraints identified through the Site Selection Report [ED029, pgs. 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. Keele University has employed renowned masterplanners BDP to prepare its masterplan and planning strategy
d) Is there robust evidence that the assumptions regarding the infrastructure required for	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

the development are realistic and that it will be deliverable?	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 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 (N.B. This site is also considered as part of Matter 6 Housing Allocations - Qu 6.3)	
<p>a) Are the various requirements set out in the policy clear, justified and effective?</p>	<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 give consideration to the alignment of a 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]. • 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

	<ul style="list-style-type: none"> • 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).
b) 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].
c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?	The site is allocated for up to 13 hectares of employment land. 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. Keele University has employed renowned masterplanners BDP to prepare its masterplan and planning strategy
d) Is there robust evidence that the assumptions regarding the infrastructure required for the	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

development are realistic and that it will be deliverable?	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 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. The Strategic Sites Assessment [ED002 Chapter 11] affirms also that KL15 is a viable and deliverable proposition; particularly with university and potential public sector involvement.
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 (MOD156) 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.

TC7 Ryecroft (N.B. This site is considered as part of Matter 6 Housing Allocations - Qu 6.3)	
<p>a) Are the various requirements set out in the policy clear, justified and effective?</p>	<p>Yes. The requirements set out in Policy TC7 [CD01, pg. 152-153] 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 (Flood Risk) is justified as part of the site is impacted by surface water flooding [ED013 & accompanying maps]. • Requirement 4 (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 5 (Air Quality Management Area) as the site falls within the Newcastle-under-Lyme Town Air Quality Management Area. • Requirement 6 (Noise Assessment and Mitigation Strategy) owing to the sites location adjacent to high volume road traffic networks. • Requirement 7 (Active travel opportunities) to improve connectivity to the town centre and aligning with the objectives of the County Council Local Cycling & Walking Infrastructure Plan.
<p>b) Have the site constraints been appropriately taken into account in the allocation of the site?</p>	<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 have been appropriately considered through the requirements set out within Policy TC7 itself [CD01, pg. 156].</p>
<p>c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?</p>	<p>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) of employment land as foreseen in CD01 (pg. 152-153).</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 Infrastructure Delivery Plan (IDP) [CD16 Appendix A] identifies the prospective role that site TC7 could play in yielding developer contributions or charges for active 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, in particular 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 (a 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>
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?	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.

TC45 York Place (N.B. This site is considered as part of Matter 6 Housing Allocations - Qu 6.3)	
<p>a) Are the various requirements set out in the policy clear, justified and effective?</p>	<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 on the basis of 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.
<p>b) Have the site constraints been appropriately taken into account in the allocation of the site?</p>	<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>
<p>c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?</p>	<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) [CD16Appendix 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 following 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.

Qu 9.7 Are the requirements of policies EMP1, EMP2 and EMP3 clear, and would the criteria identified to assess proposals on these sites be likely to be effective? In particular:

a) How would existing employment sites be identified?

- 9.7.1 This would be done on a case-by-case basis by the determination of the nature of operation being undertaken at the time of submission of a planning application. Those businesses that operate within use classes E(g), B2 and B8 would fall within this category. In the case of the existing supply [ED039 (Table 1)], a single site at Linley Road, Kidsgrove has vacant land (albeit in use currently for vehicle storage) within what is termed an existing employment site. This is also considered further in ED001 (pg 87). The merits or otherwise of schemes in this context would be based on professional officer judgement with regard to EMP2 and the wider provisions of the Local Plan.

b) Would the agent of change principle expressed within EMP2 adequately address the requirements of existing businesses?

- 9.7.2 Yes. With due regard to para 193 of the NPPF, the agent of change approach in EMP 2 accords with the sentiment that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. The requirement to provide suitable mitigation is an integral component of this, as is the onus on the developer, rather than any existing business, to achieve the policy requirements.

c) Are there any omissions in the policies and are they sufficiently flexible?

- 9.7.3 Notwithstanding the minor modification [CD15a] to para 8.13 of CD01 [MOD031], it is considered that there are no omissions in policies EMP1, EMP2 or EMP3. Taking each in turn:
- 9.7.4 For EMP1 it is considered that through the uses that may be permissible (i.e. offices, research and development, industrial processes, general industrial, storage and distribution and open storage), the policy is sufficiently flexible.
- 9.7.5 EMP2 seeks to offer clear parameters for retention of employment sites, whilst having regard to the NPPF which states that employment land should not be protected for employment use if there is no reasonable prospect of the land being used for that purpose and that applications for alternative uses of land or buildings should be treated on their merits. On this basis, the policy is sufficiently flexible.
- 9.7.6 EMP3, supports the provision of tourist development and visitor accommodation through new-build, conversion and replacement of existing buildings in appropriate locations. It is, therefore, considered sufficiently flexible.
- 9.7.7 EMP1, EMP2 and EMP3 each present clear requirements and are considered likely to be effective in assessing proposals.

Qu 9.8 Taken together, does the Plan provide for an appropriate amount and range of employment sites to meet the needs of the Borough for the Plan period?

- 9.8.1 Yes. For reasons of the responses provided to Qu 9.1 – Qu 9.7, allied to the evidence base and examination documents that have been referenced accordingly.
- 9.8.2 In doing so, the approach taken accords with the Local Plan's vision, strategic objectives and development strategy.

2. Appendix 1 – List of Reference Documents

A. The Council's evidence for employment policies and allocations is set out below.

B. National Policy:

- National Planning Policy Framework
- National Planning Practice Guidance

C. Government Regulations and Acts:

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

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

- CD01 Local Plan
- CD03 Sustainability Appraisal
- CD06a Newcastle-under-Lyme Regulation 22 statement - part 1 (Regulation 18 stage)
- CD06b Newcastle-under-Lyme Regulation 22 statement - part 2 (Regulation 19/20 stage)
- CD11 Newcastle-under-Lyme duty-to-cooperate statement of compliance (submission stage)
- CD15 & 15a Schedule of Proposed Modifications
- CD16 Infrastructure delivery plan (submission stage)
- ED001 Housing and economic needs assessment (2024)
- ED001a Housing and economic needs assessment (2023)
- ED002 Strategic employment sites assessment (2024)
- ED004 Viability assessment
- ED006 Strategic housing and employment land availability assessment methodology (2022)
- ED006a Strategic housing and employment land availability assessment (2024)
- ED008 Green belt assessment (part 4)
- ED011 Strategic transport assessment
- ED013 Strategic flood risk assessment
- ED016 Local plan site - heritage impact assessments
- ED023 Landscape and settlement character assessment study (part 1)
- ED023a Landscape and settlement character assessment study (part 2)
- ED029 Site selection report and assessments
- ED032 Plan strategy employment topic paper
- ED036 West Midlands strategic employment sites study
- ED037 National Highways lorry park demand assessment
- ED039 Employment land clarification note
- EX/NBC/03 Cover letter regarding Natural England
- EX/NBC/03a Appendix 1 Air Quality Assessment
- EX/NBC/03b Appendix 2 Habitats Regulations Assessment March 2025
- EX/NBC/03c Appendix 3 Statement of Common Ground NUL and Natural England

- EX/NBC/04 Housing land paper and trajectory
- EX/NBC/05 Flooding note for Inspector 28 March 2025
- EX/NBC/06 SFRA main report March 2025
- EX/NBC/06a NaFRA2 addendum
- EX/NBC/06b Appendix A site screening spreadsheet
- EX/NBC/06c(i) Appendix B site AB2
- EX/NBC/06c(iv) Appendix B site BW1
- EX/NBC/06d(i) Appendix C site AB2 - climate change
- EX/NBC/06d(ii) Appendix C site AB2 - present day
- EX/SCG/03 SoCG NUL and Natural England
- EX/SCG/04 NBC and Cheshire East draft - supplementary