



## Newcastle-under-Lyme Local Plan Examination

### **Action Point 32 – Review of Policy SA1 General Requirements in the Local Plan**

#### **Introduction**

1. This note is provided in response to the Inspector's request during the Matter 6 (Housing Allocations) hearing session on 25th June 2025. It clarifies the Council's proposed approach and detailed modifications to Policy SA1 (General Requirements) following these discussions.
2. The Inspector raised fundamental questions regarding the necessity, function, and potential duplication within Policy SA1. It was queried whether the policy, in its current format, was necessary, given that it largely signposts to other policies in the Plan and that the Plan should be read as a whole as a matter of course.
3. Having reflected on the discussion at the examination hearing, the Council agrees that presenting this information as a formal, standalone policy could create unnecessary repetition. The Council therefore proposes to delete Policy SA1 from Chapter 13 and move a revised, streamlined version of its content (the former Table 6) into a new Appendix.
4. This note details the process undertaken to review and refine the policy's content for its new role as a non-policy "checklist" within an Appendix to the Plan. It explains the justification for each change, demonstrating how duplication has been removed while retaining useful guidance for applicants preparing planning applications for allocated sites.

#### **Rationale for Proposed Changes**

5. During the hearing session, it became clear that Policy SA1, in seeking to provide a helpful signpost for developers, was creating issues of soundness. The Inspector's primary concerns, which the Council accepts, were:
  - **Duplication:** Much of the policy text in Table 6 was a direct repetition of requirements set out in other thematic policies (e.g., Housing, Design,

Environment). This is unnecessary as a development plan must be read as a whole.

- **Function:** The policy functioned more as a "pre-application checklist" rather than a strategic policy, questioning whether its inclusion as a policy was appropriate or necessary for soundness.
- **Proportionality:** The requirement for masterplans on all sites of 10+ dwellings was considered potentially "overly onerous" and disproportionate, particularly for full applications.

6. The Council's proposed approach of moving the revised content to an appendix resolves these issues. It removes policy duplication from the main body of the Plan while retaining a helpful guidance checklist for applicants, thereby improving clarity and usability.

### Summary of Revisions to Table 6 Content

7. The following table summarises the Council's review of each section of Table 6 from Policy SA1. It details why certain elements have been removed due to duplication and how others have been revised to be more proportionate and serve as effective guidance in the new Appendix.

Original SA1 Section / Topic	Summary of Issue Identified at Hearing	Proposed Revision for New Appendix
<b>Masterplans</b>	Requirement for a masterplan on all major sites (10+ dwellings) considered disproportionate and onerous. Duplicates requirements of Design Review (PSD7).	<b>Revised and retained.</b> Wording is amended to encourage proportionate, illustrative masterplans for major outline applications, clarifying it is not an additional onerous requirement for full applications. This aligns with the discussion at the hearing.
<b>Neighbourhood Plans</b>	Requirement to consider Made Neighbourhood Plans identified as duplicating their statutory status as part of the Development Plan.	<b>Revised and retained.</b> Wording is amended to act as a helpful prompt for applicants to ensure Made Neighbourhood Plan policies are considered early, without restating their statutory weight.

<b>Housing</b>	Sections on Affordable Housing, Housing Mix, and Housing Standards identified as direct duplication of Policies HOU1, HOU2, and HOU3 respectively.	<b>Removed.</b> This section is removed entirely to avoid duplication. The introduction to the new Appendix reminds applicants that all relevant Plan policies apply.
<b>Design</b>	Section on Design Quality identified as direct duplication of Policy PSD7.	<b>Removed.</b> This section is removed entirely to avoid duplication.
<b>Sustainable Standards of Construction, Water and Energy Use</b>	This section was identified as direct duplication of Policies CRE1 and CRE2 (Renewable Energy), and Policy SE5 (Water Resources).	<b>Removed.</b> This section is removed entirely to avoid duplication.
<b>Historic Environment</b>	Sections on Heritage Assets, Impact Assessments, and Archaeology identified as direct duplication of Policy SE9.	<b>Revised and retained as a checklist.</b> The section is re-phrased as a checklist of heritage considerations, signposting applicants to Policy SE9 and the need for relevant assessments (e.g., HIA, Desk-Based Assessment) where appropriate.
<b>All Other Sections</b>	All remaining sections (Social & Community Facilities, Landscape & Green Infrastructure, Biodiversity & Geodiversity, Environmental Health, Flood Risk, Utilities, Transport etc.)	<b>Revised and retained as a checklist.</b> These sections are re-phrased as a checklist of key considerations, signposting applicants to the relevant thematic policies they must address (e.g., IN1, SE10, SE8, SE1, SE3, IN7, IN2) and the types of supporting information or assessments that may be required. This removes the policy requirement and provides clear guidance.

## Proposed New Appendix

8. In light of the review detailed above, the Council proposes to delete Policy SA1 and Table 6 from the Local Plan and insert the refined content as a new Appendix.
9. This Appendix will serve as a helpful, non-policy checklist for applicants. Its purpose is to guide applicants to the key considerations and relevant thematic policies that will apply to development on allocated sites, thereby fulfilling the Council's original signposting objective in a manner that is more appropriate and does not create issues of policy duplication. The proposed text for the new Appendix is set out in full below.

## Appendix [X]: Checklist for Allocated Sites

10. *This checklist is provided as guidance for applicants preparing planning applications for sites allocated in the Plan. It is intended to act as a prompt for the key matters that should be considered. It does not constitute policy and does not represent an exhaustive list of all requirements. All development proposals will be assessed against the relevant policies of this Plan, which should be read as a whole, and any other material considerations.*

## Site Allocation Considerations Checklist

Consideration	Key Policy Links & Guidance
<b>Masterplanning</b>	For major sites, particularly those in outline, applicants are encouraged to prepare a suitably proportionate masterplan to demonstrate how a high-quality, sustainable, and policy-compliant scheme can be delivered. The specific scope and content of any masterplan should be discussed with the Council at an early stage.
<b>Neighbourhood Plans</b>	Applicants should ensure proposals have regard to the aims, objectives, and policies of any 'Made' Neighbourhood Plan that covers their site.
<b>Heritage &amp; Archaeology</b>	Proposals should consider impacts on heritage assets and their settings. A Heritage Impact Assessment and/or Archaeological Desk-Based Assessment may be required. <b>Refer to Policy SE9.</b>
<b>Landscape &amp; Visual Impact</b>	Proposals should consider the character of the landscape and key views. A Landscape and Visual Impact Assessment (LVIA) may be required for major development or other proposals with potential for significant visual effects. <b>Refer to Policy SE10.</b>

<b>Ecology &amp; Biodiversity</b>	Proposals should consider impacts on habitats, species, and designated nature conservation sites. A Preliminary Ecological Appraisal, further ecological surveys, and a Biodiversity Net Gain assessment will be required. <b>Refer to Policies SE7 and SE8.</b>
<b>Trees &amp; Hedgerows</b>	Proposals should consider impacts on existing trees, hedgerows, and woodlands. An Arboricultural Impact Assessment may be required. <b>Refer to Policy SE11.</b>
<b>Flood Risk, Drainage &amp; Water Management</b>	Proposals must consider flood risk from all sources and incorporate appropriate mitigation. A site-specific Flood Risk Assessment (FRA) and/or a Sustainable Drainage Systems (SuDS) strategy may be required. <b>Refer to Policies SE3, SE4, and SE5.</b>
<b>Amenity, Contamination &amp; Environmental Health</b>	Proposals must consider potential impacts on/from neighbouring uses (amenity), ground conditions, and air and water quality. Assessments for noise, odour, contamination, and air quality may be required. A Construction Environmental Management Plan (CEMP) may be required for major development. <b>Refer to Policies SE1, SE2, and SE12.</b>
<b>Infrastructure, Transport &amp; Community Facilities</b>	Proposals will be expected to be supported by, and where necessary contribute towards, required infrastructure. This includes transport, utilities (water, energy, digital), education, health, and community facilities. A Transport Assessment/Statement and Travel Plan may be required. For major schemes, a Utilities Masterplan may be required. <b>Refer to Policies IN1, IN2, IN3, IN4, IN5, IN6, IN7 and PSD6.</b>
<b>Green Belt Compensatory Improvements (for GB sites only)</b>	Proposals on sites released from the Green Belt should provide compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Details of these measures should be informed by a site-wide masterplan and relevant evidence. <b>Refer to Policy PSD5.</b>

## Conclusion

11. The Council considers that the proposed approach of deleting Policy SA1 and moving its revised and streamlined content into a new guidance-based Appendix

positively addresses the issues raised by the Inspector at the examination hearing. The Council considers that this modification improves the clarity and effectiveness of the Plan.