



Newcastle-under-Lyme Local Plan Examination

Response to Inspectors Post Examination Hearing Views – Compensatory Improvements

1. When Green Belt release is proposed, national planning policy asks that ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land be demonstrated [Para 147, National Planning Policy Framework, December 2023].
2. The Council set out an approach to looking at compensatory improvements through examination action note 25 [EX/NBC/37]. This note set out a criteria-based approach for such matters that would be identified through the development management process.
3. The Inspector in her post examination hearing advice [EX/INS/06, paragraphs 36-38] requested that the Council should, for each site where Green Belt release is contemplated, provide evidence that compensatory works are achievable and viable.

Compensatory Improvements – Wording Changes

4. Action Point 25 [EX/NBC/37] proposes several policy changes to Policy PSD5 (Green Belt). This includes the following change, in respect of compensatory improvements, to criterion 6 of Policy PSD5 (Green Belt) with changes shown as bold underlined text: -

“6. Development proposals for sites removed from the Green Belt should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt Land to offset the impact of the removal of land from the Green Belt. These improvements should demonstrably enhance environmental quality, biodiversity and accessibility. **Details of such improvements, including management and maintenance, will be considered during the development management process and assessed on an individual application basis**”.

5. In respect of the supporting text, the following changes, to paragraph 5.33 are proposed: -

“5.33 Compensatory improvements to the Green Belt will be secured through planning conditions or planning obligations such as Section 106 agreements.

Site allocations that involve removing land from the Green Belt will provide compensatory improvements to the remaining Green Belt. The scope of compensatory improvements will also be informed through early engagement with relevant landowners, key stakeholders and the local community. Compensatory improvements to the environmental quality and accessibility of remaining Green Belt land may include:

- ***New or enhanced green infrastructure.***
- ***Woodland planting, including support for the Council’s Carbon Capture Areas and Urban Tree Planting Strategy.***
- ***Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);***
- ***Improvements to biodiversity, habitat connectivity and natural capital including schemes that can also enhance natural flood resilience by managing surface water run-off and improving drainage.***
- ***New or enhanced walking and cycle routes including contributions to schemes, such as the Staffordshire County Council Local Transport Plan, Walking and Cycling Infrastructure Plan and the Public Rights of Way Improvement Plan (all as updated); and***
- ***Improved access to new, enhanced or existing recreational and playing field provision for sites in the Green Belt identified in the Local Plan or Playing Pitch Strategy”.***

6. The Council retains the view that compensatory improvements should be confirmed at the Development Management stage but notes the Inspectors request to demonstrate that schemes are available, for compensatory improvements, and are viable and achievable at the strategic level. The exact form of compensatory improvements would be confirmed at the detailed planning application stage.

Compensatory Improvements – Viability Considerations

7. There are several allowances within the Viability Study [ED004] that can be utilised towards delivering compensatory improvements, these include: -
- Biodiversity Net Gain attributable costs (at £1,000 per dwelling) [ED004, pdf pg 60.

- Section 106 contributions towards open space are charged at £1,790 per dwelling and for recreation space, charged at £190 per dwelling [ED004, pdf pg 68]
8. The combined figure of the above is almost £3,000 per dwelling. In addition, for greenfield sites, there are site opening up costs which vary dependent on the size of the site. Site opening up [ED004, pdf page 61] costs reflect the wider site and off-site requirements to secure the delivery of Greenfield sites. This may allow for other infrastructure improvements (particularly access improvements, like roads, walking and cycling paths). This is assumed as follows: -
 - Sites with 50 to 199 dwellings = £7,500 per dwelling.
 - Sites with 200 to 499 dwellings = £15,000 per dwelling; and
 - Sites with 500 or more dwellings = £20,000 per dwelling.
 9. For non-residential developments, allowances in the viability study have been made for external works at 15% of build costs [ED004, pdf pg 71] and for strategic warehousing, for site opening costs [ED004, PDF pg 71].
 10. These approaches combined are considered to address the need for compensatory improvements in viability terms.

Potential Schemes for Compensatory Improvements

11. Following engagement with Staffordshire County Council, several schemes which would provide for cycle route improvements have been identified which are identified as relevant to the existing Green Belt. These schemes are highlighted in Appendix 1 and would in the Council's view, improve accessibility to remaining Green Belt. The route improvements include: -
 - a. Improvements to Halmer End and Bignall End Cycle Route, including wayfinding and general maintenance of the route, estimated cost circa £16,200
 - b. Bathpool Country Park Cycle Route, drainage improvements. Estimated cost circa £16,800
 - c. Newcastle Greenway Cycle Route, wayfinding signage added to the cycle route, estimated cost circa £4,400
12. Furthermore, engagement with the Public Rights of Way (PROW) team at Staffordshire County Council has identified Rights of Way routes (highlighted in Appendix 2) which are graded A, B or C based on path value and status (the higher the class, the better the argument for investing in pathway improvements). Appendix 3 includes Section 53 applications for changes to the

definitive public rights of way map which are not yet determined or operational. These details are included to show potential future routes that may require investment in the future and could represent compensatory improvements.

13. In respect of costs, these will vary depending on route and the type of changes required, however, in broad terms: -

- A. Upgrading structures** with sustainable materials such as recycled plastic bridges and boardwalks. Costs vary dependant on path type, size and location (e.g. ecology, access). Small structures can cost £8,000 - £15,000 fitted whereas larger structures (e.g. bridleway bridges) over small watercourses are estimated at £30,000 - £50,000.
- B. Improving signage and waymarking** that is typically low-cost works estimated between £40-£1,000 for an average length path that includes assessment to ensure accuracy of waymarking against the line of the path.
- C. Road-path interface improvements**, such as visibility and signage where paths meet rural roads, are high value but difficult to estimate as they can require an engineering assessment initially at an estimated cost of between £500 - £2,000. Road signs in some locations require road permits and temporary traffic management. Typical roadside signs are estimated at £400/500 per sign.
- D. Accessible gates** - where livestock needs to be controlled, stiles and gates in poor condition can be replaced. Typical estimate based on kissing gates being installed is £480-£600 per feature.
- E. Improving surfaces** - solution and cost depends on length, location, type of path (users) and surface material. The installation of materials is only appropriate in certain locations, as natural paths are an important feature in rural settings. It isn't appropriate to wholly surface bridleways and this is typically restricted to urban footpaths to improve accessibility for pedestrians. Surfacing estimates are typically £3,000 - £8,000 for localised repairs to £40,000+ for a new path surface.

14. There are several considerations to be taken into account when assessing PROW routes including that: -

- a.** Successful investment often relies on and requires landowner support for e.g. to accept something that they the landowner will be responsible for (e.g. gates) or to allow access to sites. This needs to be factored in when packaging work into 'route improvement' projects.
- b.** Some routes are subject to building obstructions and other matters that can't be resolved on-the-ground but require investment in resources and procedures (e.g. path diversions).
- c.** Where infrastructure is replaced/installed, it is imperative that ongoing maintenance and management responsibilities are clear (e.g. bridges) and that these are factored into designs.

15. The schemes and costs outlined are considered to be consistent with the viability considerations contained in the Viability Assessment. Table 1 identifies sites in the Green Belt and provides some general commentary about the type of compensatory improvements that can be delivered on site. As outlined above, the planning application stage will confirm the exact final form of compensatory improvements delivered on site.
16. The note demonstrates that there are compensatory improvements available for sites proposed to be released from the Green Belt in the Local Plan. The note also sets out the broad costings expected, how they have been considered through the Local Plan viability work and the type of improvements that could be delivered on the sites.

Table 1: Green Belt Compensatory Improvements

Planning Reference	Name	Use	Size (Ha)	Total Capacity	Compensatory Improvements Green Belt
AB2	Land at J16 of the M6	Employment	80	Circa 220,000 sqm	The planning application for the site [25/00356/OUT] includes compensation measures including enhancements to public rights of way, enhancement to hedgerows and tree belts and cycle way improvements. The planning application, in outline, has yet to be determined and the Council has not come to a view as yet as to the suitability of the measures outlined in the planning application.
AB15	Land North of Vernon Avenue	Housing	1.55	33	The site could propose to support the Improvements to Halmer End and Bignall End Cycle Route as outlined above
BL18	Clough Hall, Talke	Housing	13.5	150	The site could propose to support the improvements to Bathpool Country Park Cycle Route as outlined above
CT1	Land at Red Street	Housing	22.69	530	The site could support a number of PROW improvements for Public Rights of Way category A routes in and around the site, including wider connections into Talke Pitts and Audley. The site could also make contributions towards cycle routes at Bignall End and Bathpool Country Park, located in close proximity to the site.
KL15	Land south of A525 Keele University	Housing and Employment	13	260	As confirmed in site EX/NBC/47a, the University land ownership extends to 600 acres and there are opportunities, within this wider area, to provide enhancement works, including investment in footpaths, woodland, cycle walking and other improvements to the wider community and surrounding sites.
NC13	Land west of Bullockhouse Road	Housing	3.19	100	A planning application has been received on the site (25/00358/FUL). It is proposed to deliver improvements to adjoining Council owned land. Potentially improving the equipped public open space and delivering biodiversity

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					enhancements to the Council owned land that would remain in the Green Belt would comply with paragraph 147 of NPPF23 by improving its environmental quality and accessibility. The planning application has yet to be determined, and the Council has not come to a view as yet as to the suitability of the measures outlined.
SP11	Lyme Park	Housing and Community uses	75.74	900	Following the Inspector's post hearing advice, the Council has confirmed the Green Belt boundary and that the Country Park element of the SP11 site is to be retained in the Green Belt. For sites SP11 and SP23, it is envisaged that compensatory improvements would be focused on the Country Park that runs through the SP11 site. Linkages from SP23 to the country park can be provided to facilitate access to the proposed country park by future residents for recreational purposes and therefore comply with paragraph 147 of NPPF23 by improving accessibility to the remaining Green Belt
SP23	Land at Cemetery Road	Housing	5.19	200	
TB19	Land south of Newcastle Golf Club	Housing	45.44	550	Following the Inspector's post hearing advice, the Council and the site promoters of TB19 have revised the Green Belt boundary of the site and retained the strategic open space proposed on site in the Green Belt [EX/NBC/49]. In order to support the publicly accessible areas and biodiversity improvements in the Strategic Open Space, it is proposed that compensatory improvements would be focused on this area.
TK10	Land at Crown Bank	Housing	5.33	170	Walking routes around the site perimeter can be provided to provide linear green walking routes that can provide further permeability and provide a circular walking route to connect with the existing PROW to the west. The landowner controls other

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					land in the vicinity of the site. Land to the north west of the site can be used to provide further compensatory improvements, such as biodiversity net gain, if required. Improvements to local PROW in the Talke Pitts Area could also be a source of compensatory improvements.
TK17	Land off St Martins Road	Housing	1.23	40	The site could propose to support the improvements to Bathpool County Park Cycle Route as outlined above alongside improvements to local PROW in the Talke Pitts Area.
TK27	Land off Coppice Road	Housing	2.82	90	Firstly, the proposed development would include an area of new green infrastructure along the eastern boundary of the site, where it interfaces with the wider Green Belt. This would feature new tree planting and provides opportunities for improvements to biodiversity and habitat connectivity. There may also be potential for public access via the creation of a recreational footpath, subject to the detailed design to be agreed at the planning application stage. Secondly, there is potential to provide improvements to the footpath that runs from Merelake Road, at the southern boundary of the site, in a south-easterly direction to Audley Road (adjacent to the Church of St Martin). Potential improvements are likely to be in the form of improved stiles, and enhancements around those stiles, to improve accessibility and the attractiveness of the route.