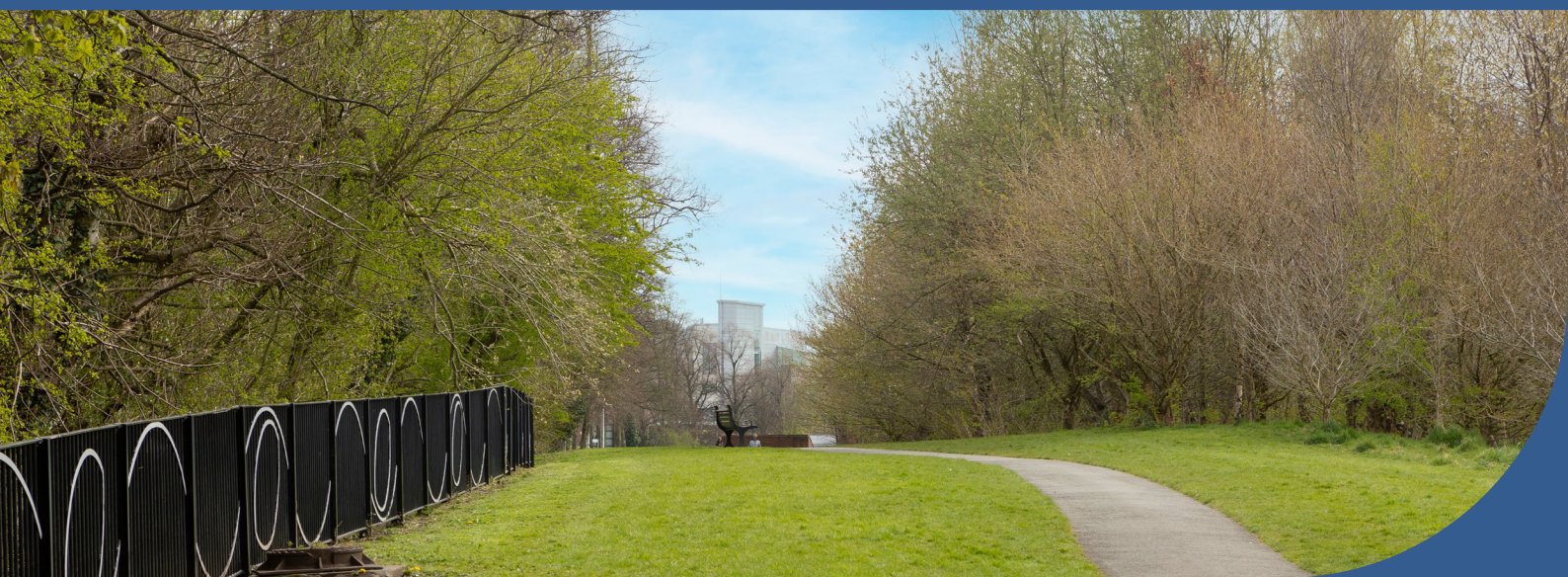


Sustainability Appraisal and Strategic Environmental Assessment of the Newcastle-under-Lyme Local Plan 2020-2040

Post-Adoption Statement

July 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal and Strategic Environmental Assessment of the Newcastle-under-Lyme Local Plan 2020-2040

Post-Adoption Statement

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Front cover: Public footpath at Lyme Valley parkway, Newcastle-under-Lyme

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Acronyms and abbreviations

AA	Appropriate Assessment
BMV	Best and Most Versatile
DLUHC	Department for Levelling up, Housing and Communities
GI	Green Infrastructure
GP	General Practitioner
HEDNA	Housing and Economic Needs Assessment
HRA	Habitats Regulations Assessment
LNR	Local Nature Reserves
LSCA	Landscape and Settlement Character Assessment
LSE	Likely Significant Effect
MHCLG	Ministry for Housing, Communities and Local Government
MSA	Mineral Safeguarding Area
NPPF	National Planning Policy Framework
NuLBC	Newcastle-under-Lyme Borough Council
PPG	Planning Practice Guidance
PRoW	Public Right of Way
RPGs	Registered Parks and Gardens
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBIs	Sites of Biological Interest
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SSSIs	Sites of Special Scientific Interest
SuDS	Sustainable Urban Drainage Systems
WCS	Water Cycle Study

1 Introduction

1.1 Context and purpose of this report

- 1.1.1 This report comprises the Sustainability Appraisal (SA) Post-Adoption Statement for the Newcastle-under-Lyme Local Plan 2020-2040. It has been prepared under Regulation 16 of the Strategic Environmental Assessment (SEA) Regulations (SI 1633) 2004¹.
- 1.1.2 The Newcastle-under-Lyme Local Plan has been prepared by the Newcastle-under-Lyme Borough Council (NuLBC). The aim of the Local Plan is to positively plan for growth and development within the area. The Local Plan is a development strategy covering 20 years which sets out strategic policies to guide future development, providing homes and jobs to meet the needs of the area, whilst protecting the environment and promoting sustainability.
- 1.1.3 During the preparation of the Local Plan, NuLBC was required to carry out an SA of the Plan. SA is a statutory process incorporating the requirements of the SEA Directive².
- 1.1.4 The purpose of this Post-Adoption Statement is to outline how the SA/SEA process has informed and influenced the Newcastle-under-Lyme Local Plan development process, and to demonstrate how consultation on the SA/SEA has been taken into account.

1.2 The Newcastle-under-Lyme area

- 1.2.1 Newcastle-under-Lyme Borough covers approximately 21,095 hectares and is situated within the County of Staffordshire, between Manchester and Birmingham (**Figure 1.1**). The city of Stoke-on-Trent lies immediately to the east, with the north-eastern part of the borough falling within the Stoke-on-Trent Green Belt. The borough had an estimated population of 123,300 in 2021.
- 1.2.2 The strategic centre and market town of Newcastle-under-Lyme lies in the north east of the borough, with the town of Kidsgrove to the north, surrounded by rural centres.
- 1.2.3 The Peak District National Park lies approximately 9.8km to the north east of the borough. The borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent.
- 1.2.4 The borough contains two Ramsar sites recognised for their internationally important wetlands: Midland Meres and Mosses Phase 1 and 2 at Betley Mere. A range of statutory and non-statutory biodiversity designations can also be found in the borough, including Sites of Special Scientific Interest (SSSIs), several stands of ancient woodland, Local Nature Reserves (LNRs) and Sites of Biological Importance (SBIs), as well as a range of priority habitats.
- 1.2.5 Several watercourses pass through the borough including the Lyme Brook (a tributary of the River Trent) in the east through Newcastle-under-Lyme Town Centre, as well as the River Lea. Some areas of Flood Zone 2 and 3 are present alongside these watercourses.
- 1.2.6 Newcastle-under-Lyme has a rich historic environment, with a suite of cultural heritage designations including 365 Listed Buildings (Grade I, II* and II), 13 Scheduled Monuments (SMs), two Registered Parks and Gardens (RPGs) and several conservation areas, as well as a range of non-designated locally important buildings and structures.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 10/06/26]

² SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 10/06/26]

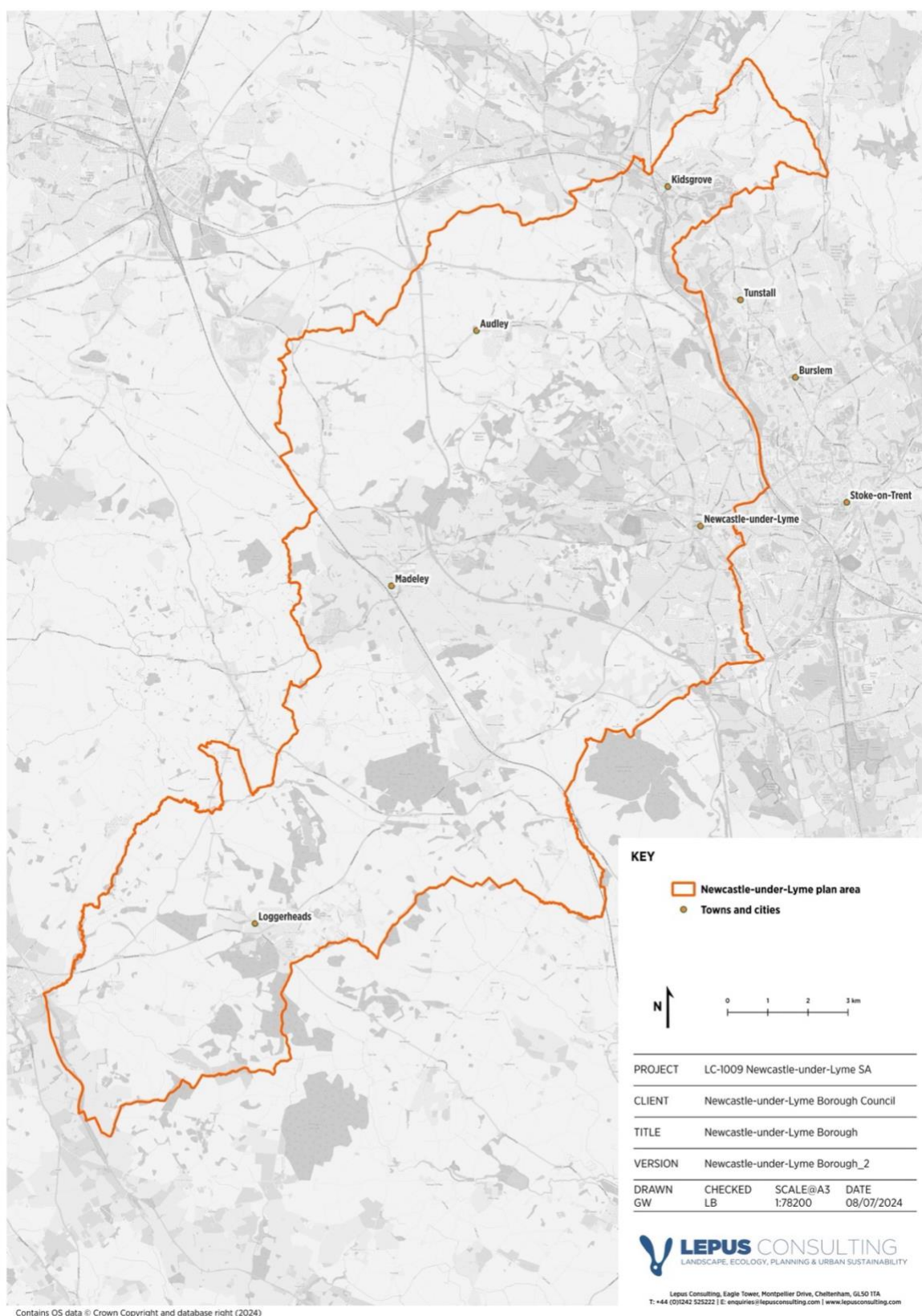


Figure 1.1: The Newcastle-under-Lyme Local Plan area

1.3 About the Newcastle-under-Lyme Local Plan

- 1.3.1 The Newcastle-under-Lyme Local Plan sets out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure. The Plan also sets out a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- 1.3.2 The Local Plan seeks to:
- Provide for the additional new housing and other development that will be required to meet future identified needs;
 - Demonstrate sustainable development that helps to combat climate change and carbon reduction.
 - Establish a Plan period up to 2040 in order to ensure there will be a minimum 15-year time horizon.

1.4 Requirement for the Post-Adoption Statement

- 1.4.1 In order to meet the legislative requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (2004), a Post-Adoption Statement is required to be published “*as soon as reasonably possible after the Plan has been adopted*”³.
- 1.4.2 SEA Regulation 16⁴ sets out the post-adoption procedures, including the requirement to produce a statement containing a number of particulars (Regulation 16 Paragraph 4). **Box 1.1** presents the requirements of this SA/SEA Post-Adoption Statement.
- 1.4.3 Following best practice guidance, the SEA has been incorporated into the SA of the Newcastle-under-Lyme Local Plan. This Post-Adoption Statement therefore provides sustainability information beyond the strict environmental parameters outlined in **Box 1.1**, to reflect the broader sustainability appraisal process.

³ RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sappracticeadvicefull2018c.pdf> [Date accessed: 10/06/26]

⁴ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date accessed: 10/06/26]

Box 1.1: SEA Regulation 16 Post-Adoption Procedures⁵

Information as to adoption of plan or programme

16.—

- 1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—
 - a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
 - b) take such steps as it considers appropriate to bring to the attention of the public—
 - i) the title of the plan or programme;
 - ii) the date on which it was adopted;
 - iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
 - iv) the times at which inspection may be made; and
 - v) that inspection may be made free of charge.
- 2) As soon as reasonably practicable after the adoption of a plan or programme—
 - a) the responsible authority shall inform—
 - i) the consultation bodies;
 - ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
 - iii) where the responsible authority is not the Secretary of State, the Secretary of State; and
 - b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).
- 3) The matters are—
 - a) that the plan or programme has been adopted;
 - b) the date on which it was adopted; and
 - c) the address (which may include a website) at which a copy of—
 - i) the plan or programme, as adopted,
 - ii) its accompanying environmental report, and
 - iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.
- 4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —
 - a) how environmental considerations have been integrated into the plan or programme;
 - b) how the environmental report has been taken into account;
 - c) how opinions expressed in response to—
 - i. the invitation referred to in regulation 13(2)(d);
 - ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
 - d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
 - e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

⁵ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date accessed: 10/06/26]

1.5 Using this document

- 1.5.1 This Post-Adoption Statement should be read alongside the Newcastle-under-Lyme Local Plan (2020-2040) and associated SA documents, which are summarised in **Chapter 2** and can be found on the Newcastle-under-Lyme Local Plan website⁶.
- 1.5.2 This report has been prepared in order to meet the requirements of the SEA Regulations (see **Box 1**). The chapters are structured as per the criteria presented in the Regulations, as shown in **Table 1.1**.

Table 1.1: Guide to the requirements of the SEA Regulations for this post adoption statement

Requirements of Regulation 16 (4)	Location in this report
a) how environmental considerations have been integrated into the plan or programme;	Chapter 2 (the SA Framework)
b) how the environmental report has been taken into account;	Chapter 4
c) how opinions expressed in response to— i. the invitation referred to in regulation 13(2)(d); ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;	Chapter 5
d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Chapter 5
e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;	Chapter 3
f) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Chapter 6

⁶ Newcastle-under-Lyme Borough Council. *Newcastle-under-Lyme Local Plan 2020-2040*. Available at: <https://www.newcastle-staffs.gov.uk/downloads/download/1514/newcastle-under-lyme-local-plan-2020-2040> [Accessed: 15/07/26]

2 Overview of the assessment process

2.1 Integrated approach to SA and SEA

- 2.1.1 The requirements to carry out the SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 2.1.2 The SEA Directive applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types.) The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 2.1.3 The SEA Directive has been transposed into English by the SEA Regulations. Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Newcastle-under-Lyme Local Plan to be subject to SEA throughout its preparation.
- 2.1.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁷ and should include an appraisal of the economic, social and environmental sustainability of development plans. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

2.2 Best practice guidance

- 2.2.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance including the following:
- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁸.
 - Office of Deputy Prime Minister (ODPM) (2005) A practical Guide to the SEA Directive⁹.
 - Department for Levelling up, Housing & Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)¹⁰.

⁷ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 10/06/26]

⁸ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 10/06/26]

⁹ ODPM (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 10/06/26]

¹⁰ The Newcastle-under-Lyme Local Plan was prepared under the NPPF (December 2023). DLUHC (2023) National Planning Policy Framework. Available at:

- DLUHC and Ministry for Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)¹¹.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans¹².

2.3 SA and the sequential plan-making process

2.3.1 The SA (incorporating SEA) process has accompanied and informed the plan-making process on an iterative basis. The key SA outputs are as follows:

- SA Scoping Report (NuLBC, 2021)¹³;
- Regulation 18 SA Report (Lepus, 2023)¹⁴;
- Regulation 19 SA Report (Lepus, 2024)¹⁵; and
- SA of the Proposed Main Modifications (Lepus, 2025)¹⁶.

2.3.2 **Table 2.1** sets out the stages of preparation of the Newcastle-under-Lyme and the accompanying stage of SA where relevant.

Table 2.1: Timeline of SA reports in conjunction with Newcastle-under-Lyme Local Plan preparation

Date	Local Plan Stage	Sustainability Appraisal
August 2021	Plan-making commences.	SA Scoping Report (2021) This report set the criteria for assessment, established the baseline data and provided an overview of key sustainability issues.
April –May 2023	Regulation 18 Report The Regulation 18 document outlined the main issues NuLBC identified for the new plan, assessed whether the current development strategy remains appropriate, and identified which previous adopted policies require revision.	Regulation 18 Report (2023) This report assessed the identified options for housing number, development strategy, housing distribution, employment distribution, draft development management policies, and reasonable alternative sites.

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 04/06/26]

¹¹ DLUHC and MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 10/06/26]

¹² RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 10/06/26]

¹³ NuLBC (2021). Newcastle-under-Lyme Borough Council Local Plan (2020-2040). SA Scoping Report. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan/2> [Date accessed: 10/06/26]

¹⁴ Lepus Consulting (2023) Regulation 18 Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. May 2023. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/2607/newcastle-under-lyme-sustainability-appraisal-regulation-18-stage-> [Date accessed: 10/06/26]

¹⁵ Lepus Consulting (2024) Sustainability Appraisal of the Newcastle-under-Lyme Local Plan. Volume 1 of 3. July 2024. Available at <https://www.newcastle-staffs.gov.uk/downloads/file/2606/newcastle-under-lyme-sustainability-appraisal-regulation-19-stage-> [Date accessed: 10/06/26]

¹⁶ Lepus Consulting (2025) Newcastle-under-Lyme Local Plan 2020-2040 Proposed Main Modifications: Sustainability Appraisal of the Main Modifications. October 2025. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/3572/main-modifications-sustainability-appraisal> [Date accessed: 04/06/26]

Date	Local Plan Stage	Sustainability Appraisal
January – July 2024	Regulation 19 Publication Plan This consultation set out the final draft of the Local Plan prepared by the NuLBC before it was submitted to the Planning Inspectorate for Examination.	Regulation 19 SA Report (2024) This report was prepared to meet the requirements of the SEA Environmental Report. It presented the assessment of the Publication Local Plan, including the evaluation of proposed strategic policies and site allocations, alongside an updated appraisal of reasonable alternatives. The report also included assessment of additional reasonable alternative sites identified by NuLBC since the previous stage.
October 2025	Main Modifications Schedules of proposed Main Modifications to the submitted version of the Local Plan to address the matters raised during the Examination, in particular the inspectors' post-hearing letter.	SA of the Main Modifications (2025) This report was prepared to evaluate the proposed modifications to the Local Plan following the examination process.

2.4 SA Framework

- 2.4.1 The SA process used an SA Framework to appraise the Plan as it evolved. The purpose of the SA Framework is to provide a way of ensuring that the Local Plan preparation process considers the environmental, social and economic impacts of the proposed site allocations and policies on the various environmental, social and economic receptors located in and around the borough. The SA Framework offers a consistent and robust means of description, analysis and comparison of these impacts.
- 2.4.2 The SA Framework for the Newcastle-under-Lyme Local Plan consists of 12 sustainability objectives. The extent to which these objectives will be achieved can, in most cases, be measured using a range of indicators. The SA Objectives were largely informed by topics of Annex I (f) of the SEA directive¹⁷, taking into account other relevant national, regional and local plans and programmes and local key issues. By considering each of these influences, the SA Framework allows for a robust, thorough and meaningful SA.
- 2.4.3 The SA Objectives included within the SA Framework are set out in **Table 2.2**.

Table 2.2: Summary of the SA Objectives

No.	SA Objective	Relevance to SEA Regulations
1	Climate Change: To contribute to the reduction of greenhouse gases and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment.	Climatic factors
2	Air: To improve air quality, creating cleaner and healthier air.	Air

¹⁷ Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

No.	SA Objective	Relevance to SEA Regulations
3	Biodiversity, Flora and Fauna: Protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity.	Biodiversity, flora and fauna
4	Natural Resources and Waste: To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources, ensure the efficient use of mineral resources and reduce waste.	Soil and material assets
5	Flooding: To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems (SuDS).	Water, human health and material assets
6	Water: To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive.	Water
7	Cultural Heritage: To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings.	Cultural heritage
8	Landscape: To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.	Landscape
9	Health and Wellbeing: To increase life expectancy and improve the health and mental wellbeing of the population overall; and to maintain and enhance the quality, accessibility and connectivity of open space and blue-green infrastructure.	Human health
10	Equality: To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, including availability of a warm, safe home are available to all sectors of the population with particular emphasis on deprived neighbourhoods.	Population
11	Transport and Accessibility: To reduce the need to travel while increasing transport choice including the promotion of safe and efficient public transport and active travel options at the heart of a transport network that provides accessibility for all.	Population and climatic factors
12	Economy: To protect and enhance the vitality and viability of centres and ensure the provision of a range of employment land and premises that meets the needs of the business community and provides retail opportunities for local communities.	Population

2.4.4 The likely adverse and positive sustainability effects of the Newcastle-under-Lyme Local Plan as identified in the various SA Reports are presented in **Chapter 4** (see **Tables 4.1** and **4.2**).

2.4.5 The SA Methodology, as set out in Chapter 4 of the Regulation 19 SA Report (2024), included a number of topic-specific methodologies and assumptions relating to each of the SA Objectives.

2.5 Habitats Regulations Assessment

2.5.1 The Newcastle-under-Lyme Local Plan was subject to a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)¹⁸ (the Habitats Regulations).

¹⁸ The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

2.5.2 Following a screening exercise (Stage 1 of the HRA Process) Likely Significant Effects (LSEs) were identified at the following European sites, which were screened into the HRA:

- Cannock Chase SAC – water quality and quantity
- Humber Estuary SAC, SPA and Ramsar – water quality and quantity
- Mersey Estuary SPA and Ramsar – water quality and quantity
- Midland Meres and Mosses Phase 1 Ramsar – water quality and quantity, recreational pressure and urbanisation
- Midland Meres and Mosses Phase 2 Ramsar – air quality, water quality and quantity, recreational pressure and urbanisation
- Pasturefields Salt Marsh SAC – water quality and quantity
- Peak District Dales SAC – water quality and quantity
- Peak District Moors (South Pennine Moors Phase 1) SPA – water quality and quantity
- Severn Estuary SAC, SPA and Ramsar – water quality and quantity
- South Pennine Moors SAC – water quality and quantity
- West Midland Mosses SAC – water quality and quantity

2.5.3 An Appropriate Assessment (Stage 2 of the HRA process) was undertaken at the Regulation 19 stage¹⁹ to assess the LSEs in more detail, which factored in the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects. The HRA concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in combination.

¹⁹ Lepus Consulting (2024) Newcastle-under-Lyme Publication Draft Local Plan 2020 – 2040 Regulation 19 Habitats Regulations Assessment, July 2024. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/2608/newcastle-under-lyme-habitats-regulations-assessment-regulation-19-stage-> [Date accessed: 10/06/26]

3 Why the adopted plan was chosen, in light of reasonable alternatives

3.1 Reasonable alternatives

- 3.1.1 The SA needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach. These should be assessed against the baseline environmental, economic and social characteristics of the area, as well as the likely scenario if the plan is not adopted. Reasonable alternatives are the realistic options considered by the plan-maker when developing policies. They must be sufficiently distinct to allow meaningful comparisons of their sustainability effects.
- 3.1.2 At each stage of the NuLBC plan-making process, different reasonable alternatives were identified, described and evaluated through the SA process.
- 3.1.3 All reasonable alternatives have been prepared by the Council's plan makers, informed by consultation and stakeholder engagement. These covered a range of plan components, including (but not limited to) housing and employment growth options, growth direction options, growth scenario options, safeguarded land options and development sites set out in **sections 3.2 – 3.6** below.

3.2 Housing and employment growth options

- 3.2.1 The Regulation 18 SA²⁰ assessed three housing options based on the numbers derived from the Housing and Economic Needs Assessment (HEDNA) Update (2023)²¹:
- 1) Standard method (358 dwellings per annum and 7,160 total dwelling requirement 2020-2040);
 - 2) Midpoint of employment forecasts (301 dwellings per annum and 6,020 total dwelling requirement 2020-2040);
 - 3) Highest employment forecast (369 dwellings per annum and 7,380 total dwelling requirement 2020-2040).
- 3.2.2 The appraisal identified broadly similar sustainability performance across all three options. Option 2 performed best against most environmental SA Objectives due to its lower housing requirement, reducing likely pressure on biodiversity, landscape, water resources and natural resources. Option 3 performed best for equality and housing provision by exceeding identified housing need but was assessed as the worst-performing option against environmental objectives because of the larger scale of growth proposed. Option 1 was selected by the Council as the preferred option at the Regulation 18 stage, as it aligned with the local housing needs assessment, supported projected job growth and was considered the most deliverable option when balanced against site opportunities and constraints.

²⁰ Lepus Consulting (2023). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 18 Sustainability Appraisal Report. Available at: https://moderngov.newcastle-staffs.gov.uk/NULBC/LP/LC-936_Vol_3of3_NuL_Reg18_SA_Appendices_1_170523LB_comp.pdf [Date accessed: 28/06/26]

²¹ Turley (2023) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. March 2023. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/5> [Date accessed: 03/06/26]

- 3.2.3 The Regulation 19 SA²² included an assessment of three updated housing figures identified by NuLBC following the HEDNA update (April 2024)²³:
- 1) Standard method (347 dwellings per annum and 6,940 dwelling requirement 2020-2040);
 - 2) Standard method plus uplift for working age population (400 dwellings per annum and 8,000 total dwelling requirement 2020-2040);
 - 3) Higher growth option (435 dwellings per annum and 8,700 total dwelling requirement 2020-2040).
- 3.2.4 The appraisal found that all options would meet or exceed identified housing needs and performed similarly overall. Option 1 performed best against environmental objectives due to its lower level of growth, while Option 3 performed best against housing provision and equality objectives. Option 2, providing for 8,000 dwellings, was identified as the best-performing option overall as it balanced economic, social and environmental outcomes, aligned housing growth with employment forecasts and limited environmental impacts relative to the higher growth option. The Council therefore selected Option 2 as the preferred housing requirement.
- 3.2.5 The Regulation 18 SA assessed three employment growth options informed by the 2023 HEDNA:
- 1) Standard Method (45.3-68.8ha need, 49.9ha supply and 269 jobs);
 - 2) Midpoint of employment forecasts (20.7-68.8ha need, 49.9ha supply and 207 jobs);
 - 3) Highest employment forecast (36.5-68.8ha need, 49.9ha supply and 281 jobs).
- 3.2.6 All options performed similarly against the SA framework, with uncertainty identified in relation to several environmental objectives due to unknown site locations and development characteristics. Option 3 was assessed as providing the greatest social and economic benefits through supporting the highest level of job growth. However, the Council selected Option 1 as the preferred option because it aligned with the housing growth strategy based on the standard method and was considered the most deliverable option for supporting economic growth within the borough.
- 3.2.7 The Regulation 19 SA assessed three updated employment growth options informed by the 2024 HEDNA update:
- 1) Standard Method (43ha need, 48ha supply and 167 jobs);
 - 2) Standard Method plus uplift for working age population (63-83ha need, 48ha supply and 237 jobs);
 - 3) Higher growth option (83ha need, 48ha supply and 347 jobs).

²² Lepus Consulting (2024). Newcastle-under-Lyme Local Plan. Newcastle-under-Lyme Regulation 19 Sustainability Appraisal Report. Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/2606/newcastle-under-lyme-sustainability-appraisal-regulation-19-stage->

²³ Turley (2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme. April 2024. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/> [Date accessed: 04/06/26]

- 3.2.8 All options performed similarly against the SA framework, reflecting the shared employment land supply baseline of 48ha. While Option 3 was identified as likely to deliver the greatest economic and employment benefits, Option 2 was selected by the Council as the preferred option as it aligned with the preferred housing growth strategy, supported projected increases in the working-age population and represented the most deliverable balance between economic growth aspirations and development constraints within the borough.

3.3 Growth direction options

- 3.3.1 A series of growth direction options were identified and assessed through the SA process to inform the spatial strategy. Six options were initially assessed at Regulation 18, with a further option (Growth Direction Option 0) assessed at Regulation 19:

- Growth Direction 0 (Maximising development in development boundaries, including density uplift within town centres and at locations well served by public transport);
- Growth Direction 1 (Development on strategic sites outside the Green Belt – Large rural extensions);
- Growth Direction 2 (Strategic Green Belt release for an urban extension – University Growth Corridor);
- Growth Direction 3 (Green Belt release for development of strategic sites – Talke and Chesterton expansion);
- Growth Direction 4 (Green Belt release for development of strategic sites – Kidsgrove expansion);
- Growth Direction 5 (Green Belt release for development of strategic sites – Audley Rural expansion);
- Growth Direction 6 (Combination of strategic sites across the borough comprising of both sites outside the Green Belt and sites which require Green Belt release).

- 3.3.2 The SA identified Growth Direction 2 and 4 as the strongest performing individual options overall. These options were considered likely to deliver a range of sustainability benefits through their proximity to Newcastle-under-Lyme Town, existing public transport links, employment opportunities, and access to services and infrastructure. Growth Direction 0 performed particularly well in relation to the efficient use of land, accessibility to services, and support for sustainable transport by focusing development in urban areas. However, it was not considered capable of meeting the borough's development needs on its own and would require significant reliance on neighbouring authorities to accommodate unmet needs.

- 3.3.3 The Council selected Growth Direction Option 6, a hybrid approach combining strategic development locations across the borough, as the preferred spatial strategy. This option was considered to provide the most balanced approach to accommodating growth by directing development towards the main urban and strategic centres while supporting smaller-scale development in rural areas. The strategy also reflects the principles of Growth Direction Option 0 by prioritising brownfield land and opportunities within existing development boundaries before considering sites outside those boundaries. The preferred strategy was therefore considered to represent the most sustainable and deliverable approach when balanced against environmental constraints, infrastructure capacity and development opportunities across the borough.

3.4 Growth scenario options

3.4.1 Following the selection of Growth Direction 6 at the Regulation 19 stage, four alternative growth scenarios were identified and assessed through the SA process:

- Growth scenario 6a (69.6ha employment land supply)
- Growth scenario 6b (104.6ha employment land supply)
- Growth scenario 6c (142.6ha employment land supply)
- Growth scenario 6d (133.6ha employment land supply)

3.4.2 The assessment identified Options 6b and 6d as the best performing options overall, due to development supported within the University of Keele Growth Corridor, with associated benefits for employment skills and training opportunities. Although Scenario 6c would deliver the greatest quantum of employment land overall, the wider economic and educational benefits associated with the Keele Growth Corridor meant that Scenarios 6b and 6d were considered the strongest performing options.

3.4.3 All scenarios were identified as having potential adverse effects on a range of environmental objectives as a result of developing previously undeveloped land. These included potential effects on biodiversity, landscape character, air quality, flood risk, natural resources and the setting of heritage assets. Scenarios 6b and 6d were also considered more likely to result in adverse effects on water quality, as parts of the proposed development would be located within Groundwater Source Protection Zone 3. Nevertheless, the assessment concluded that the environmental effects associated with all four options were broadly similar and reflected the scale of growth proposed.

3.4.4 The Council selected Growth Scenario 6b as the preferred option. This scenario was considered capable of supporting the anticipated level of employment and jobs growth within the borough, while aligning with the findings of the Strategic Employment Sites Study, which identified a clear case for allocating sites AB2 and KL15. Scenario 6b was also identified as one of the best-performing options in the SA, balancing economic benefits with the delivery of strategic employment growth within the Keele University Growth Corridor.

3.5 Safeguarded land options

3.5.1 Three reasonable safeguarded land options were identified by NuLBC, informed by the findings of the Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessments and associated advice regarding the need for safeguarded land beyond the plan period:

- Option 1: No safeguarded land identified;
- Option 2: Safeguarded land equivalent to approximately five years of housing growth beyond the plan period (1,562–1,800 dwellings); and
- Option 3: Safeguarded land equivalent to approximately 7.5 years of housing growth beyond the plan period (2,342–2,700 dwellings).

3.5.2 The SA assessment identified Options 2 and 3 as performing similarly overall, with both providing additional flexibility to meet longer-term housing needs and supporting the delivery of a wider range of housing types, including affordable housing. Option 3 was considered likely to perform marginally better due to the longer period of future housing need it would accommodate. However, both options were also associated with adverse environmental effects resulting from the loss of undeveloped land, including impacts on biodiversity, natural resources and landscape character.

3.5.3 Greater uncertainty was identified for Option 1 due to the uncertainty associated with the location and nature of future development, and potential reliance on windfall developments and development in locations that may be less accessible to services and facilities. Whilst all three options were identified as having adverse effects on landscape character, Option 1 was considered more likely to result in significant adverse landscape effects because future Green Belt releases could occur in a less planned and coordinated manner.

3.5.4 Following consideration of the SA findings and the wider evidence base, NuLBC selected Option 1 (no safeguarded land) as the preferred approach. The Council concluded that there was significant uncertainty regarding housing and employment needs beyond the plan period, with insufficient evidence to demonstrate the exceptional circumstances required to justify Green Belt release. The Local Plan provides a degree of flexibility within its housing and employment land supply which will contribute towards meeting longer-term needs, with an early review of the Local Plan likely due to reforms to the planning system. On this basis, it was considered that the need for safeguarded land was uncertain and that identifying safeguarded land at this stage would not be justified.

3.6 Reasonable alternative sites

3.6.1 An assessment of reasonable alternative development sites was undertaken throughout the preparation of the Newcastle-under-Lyme Local Plan. In total, 177 reasonable alternative sites were considered throughout the SA process:

- 128 sites for residential development;
- Six sites for employment development;
- 23 sites for mixed-use development (residential and employment);
- One site with an uncertain future (residential or employment); and
- 11 sites for Gypsy and Traveller accommodation.

3.6.2 The majority of sites (141) were assessed through the Regulation 18 SA, with a further 36 new or amended sites assessed as part of the Regulation 19 SA. The assessment considered the likely sustainability effects of each site both before and after the application of mitigation measures. This approach was adopted to ensure transparency in the appraisal process and to identify the extent of potential adverse effects prior to mitigation through Local Plan policies.

3.6.3 The assessment identified a range of positive and negative sustainability effects across the reasonable alternative sites. Positive effects were generally associated with the delivery of new housing and employment opportunities, support for low-carbon technologies, improvements to waste management, access to public open space and public rights of way, low levels of fluvial flood risk, and proximity to public transport services. Negative effects varied between sites but included potential impacts on air quality, biodiversity and ecological networks, loss of undeveloped land and best and most versatile agricultural land, flood risk, landscape character, Green Belt openness, heritage assets, water quality, and accessibility to key services and facilities.

3.6.4 Following consideration of the SA findings, together with other evidence base studies including viability assessments, NuLBC selected preferred development sites for allocation within the Local Plan. The detailed assessment findings for all reasonable alternative sites are presented within the Regulation 18 and Regulation 19 SA Reports, whilst the Council's reasons for the selection and rejection of individual sites are set out in Appendix I of the Regulation 19 SA Report.

- 3.6.5 The selected allocations were considered to provide the most appropriate balance between delivering the borough's housing, employment and traveller accommodation needs and minimising adverse effects on environmental, social and economic sustainability objectives.

3.7 Overall conclusions on reasonable alternatives

- 3.7.1 The SA process has demonstrated that the adopted Newcastle-under-Lyme Local Plan represents a balanced and justified approach to accommodating the borough's housing, employment and infrastructure needs when considered against the range of reasonable alternatives assessed throughout plan preparation.
- 3.7.2 The appraisal of housing and employment growth options identified that no single option performed strongly against all sustainability objectives. Lower growth options generally performed better against environmental objectives by reducing pressure on natural resources, biodiversity and landscape character, while higher growth options delivered greater economic and social benefits through increased housing provision and employment opportunities. The preferred housing and employment requirements were selected as they provided an appropriate balance between supporting growth, meeting identified needs and limiting environmental effects.
- 3.7.3 The assessment of growth direction and growth scenario options similarly demonstrated that each reasonable alternative was associated with a mix of positive and adverse sustainability effects. Whilst some options performed particularly well in relation to accessibility, sustainable transport and economic growth, others offered advantages in terms of land use efficiency or reduced environmental impacts. The preferred hybrid spatial strategy and associated growth scenario were selected because they provide the most sustainable and deliverable approach to distributing development across the borough, making use of existing infrastructure and supporting strategic economic opportunities.
- 3.7.4 The appraisal of safeguarded land options highlighted the benefits of providing flexibility for future growth, but also identified potential adverse effects associated with the loss of undeveloped land and uncertainty regarding long-term development requirements. The Council concluded that the evidence did not justify the identification of safeguarded land at this stage and that future needs would be more appropriately considered through a future review of the Local Plan if required.
- 3.7.5 The assessment of reasonable alternative development sites confirmed that all sites were associated with a combination of sustainability benefits and constraints. The selection of preferred allocations was informed by the SA findings alongside the wider evidence base, including Green Belt assessments, infrastructure capacity, viability considerations, deliverability, environmental constraints and planning policy objectives. The SA provided a consistent and transparent framework for comparing sites and identifying mitigation requirements where potential adverse effects were identified.
- 3.7.6 Overall, the adopted Newcastle-under-Lyme Local Plan reflects a reasoned and transparent response to the assessment of reasonable alternatives undertaken through the SA process. Whilst some residual adverse effects are unavoidable, particularly in relation to the loss of undeveloped land, biodiversity impacts, landscape change and climate-related pressures associated with growth, the Plan includes a range of policies and mitigation measures intended to avoid, minimise and manage these effects. In this context, the SA demonstrates that the chosen strategy is appropriate, proportionate and supported by the available evidence, and that reasonable alternatives have been properly considered in accordance with the requirements of the SEA Regulations.

4 How the Environmental Report has been taken into account

4.1 SA findings

- 4.1.1 The SA, incorporating SEA, has played a central role in shaping the Newcastle-under-Lyme Local Plan throughout its preparation. The process has not been a standalone exercise; rather, it has informed key decisions relating to spatial strategy, site selection, policy development and mitigation.
- 4.1.2 At each stage of plan-making, the SA has provided a consistent and proportionate framework for testing the likely environmental, social and economic effects of emerging options. This has enabled the Council to identify where adverse effects may arise, consider reasonable alternatives, and refine the Plan to improve overall sustainability performance.
- 4.1.3 The influence of the SA is evident in several aspects of the Local Plan. In particular, the appraisal has:
- Informed the evolution of the growth strategy, including the selection of a hybrid spatial approach that combines development within existing settlements, strategic urban extensions and carefully targeted Green Belt release;
 - Supported the comparative assessment and selection of housing, employment, mixed-use and Gypsy and Traveller site allocations, helping to identify the most sustainable and deliverable opportunities across the borough;
 - Contributed to the refinement and strengthening of planning policies, particularly those relating to climate change mitigation or adaptation, Green Belt, biodiversity and geodiversity, green infrastructure, landscape protection, sustainable transport, heritage conservation and protection of water resources;
 - Highlighted the need for mitigation and monitoring measures to address residual adverse effects associated with growth, including impacts on biodiversity, landscape character, air quality, climate change, water quality, flood risk, Green Belt openness and the loss of undeveloped land.
- 4.1.4 The SA findings presented below should therefore be understood as part of an iterative process which has influenced the final form of the Local Plan, rather than a retrospective assessment of a fixed plan.
- 4.1.5 The SA of the Local Plan, in particular the Regulation 19 SA Report, identified residual positive and negative effects associated with several SEA topics. This chapter discusses the significance of the residual effects and reviews the extent to which NuLBC has responded to the findings of the iterative SA process.
- 4.1.6 A range of positive impacts on sustainability were identified as a result of the Local Plan, which are highlighted throughout the policy and site assessments in Appendices G and F of the Regulation 19 SA Report, and are summarised in **Table 4.1**.

Table 4.1: Likely residual positive sustainability effects of the Newcastle-under-Lyme Local Plan recorded in the Regulation 19 SA (2024)

Summary of residual positive effects	
1	Multi-functional green infrastructure network The Local Plan promotes the conservation and enhancement of multi-functional GI across the borough, through encouraging development proposals to increase connectivity of the wider green and blue infrastructure network. Although the proposed development within the Local Plan will result in the loss of greenfield land and associated GI to some extent, the Local Plan policies are expected to mitigate and re-compensate this loss of GI, resulting in a positive effect on GI provision in the longer term.
2	Access to public greenspace Various Local Plan policies aim to provide a range of open spaces, sport facilities and recreational spaces for site end users, and compensate for any facilities lost to development. This is expected to help facilitate healthy and active lifestyles and supplement the borough's existing recreational resource.
3	Access to PRow and cycle networks A large number of site allocations are expected to link to existing PRow routes which have good coverage across the borough, and some allocations are located in proximity to cycle paths. Various Local Plan policies seek to create permeable neighbourhoods which promote cycling and walking, which is likely to improve the coverage of, and accessibility to the pedestrian and cycle networks across the borough. This would be expected to encourage residents to participate in physical exercise and active travel, with benefits to health and wellbeing.
4	Provision of housing to meet local need In order to meet the identified housing need, the Local Plan proposes to deliver 8,000 new dwellings within the Plan period. Policies set out in the Plan include various requirements to ensure the provision of an appropriate mix of housing types and tenures that will address the needs of different groups including those with specialist needs, first time home buyers, and the Gypsy and Traveller community.
5	Provision of employment opportunities The Plan seeks to deliver 63ha of employment land, exceeding the need identified in the latest HEDNA. Various Local Plan policies are also expected to improve access to employment opportunities, such as through improving sustainable transport options, and by locating employment-lead development in areas with good accessibility to the road and transport networks.
6	Community cohesion The Local Plan policies demonstrate NuLBC's commitment to enhancing community cohesion. These address various needs such meeting accommodation requirements, and safeguarding community services and facilities. The policies also encourage the careful design to co-locate new development with community facilities and open spaces in order to deliver a high-quality public realm.
7	Mineral resources Although the majority of development sites coincide with MSAs, the Staffordshire Minerals Local Plan²⁴ seek to prevent the unnecessary sterilisation of mineral resources from non-minerals development. This is expected to conserve mineral resources by ensuring that any potential impact on safeguarded minerals is avoided or minimised.

²⁴ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire 2015 to 2030. Available at: <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/Documents/The-Minerals-Local-Plan-for-Staffordshire-2015-2030.PDF> [Date accessed: 26/06/26]

- 4.1.7 The mitigation proposals presented in the Local Plan provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.
- 4.1.8 **Table 4.2** sets out the adverse residual effects identified in the Regulation 19 SA. These effects are primarily associated with the scale and distribution of growth proposed in the adopted Newcastle-under-Lyme Local Plan and include impacts relating to air quality, greenhouse gas emissions, ecological network fragmentation, landscape character, Green Belt openness, loss of undeveloped land and best and most versatile agricultural land, increased pressure on water and wastewater infrastructure, and the urbanisation of rural areas. While many of these effects are expected to be reduced through the implementation of Local Plan policies and project-level mitigation measures, they cannot be fully avoided. Several effects, particularly those relating to climate change, air quality and ecological enhancement, are also subject to uncertainty and will depend on future technological advances, infrastructure investment and the effectiveness of mitigation measures. As a result, some residual adverse effects are likely to remain, particularly when considered cumulatively, and these are reflected in the monitoring recommendations set out in **Chapter 6**.

Table 4.2: Likely residual adverse sustainability effects of the Newcastle-under-Lyme Local Plan recorded in the Regulation 19 SA (2024)

Summary of residual adverse effects	
1	Reduction in air quality and increased pollutant emissions Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. The policies would be expected to prevent unacceptable impacts on human health associated with air pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality as a whole. Over time, this adverse impact is likely to be reduced should there be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars, alongside other advances in technology.
	Fragmentation of the ecological network The Local Plan is expected to result in the loss of a significant amount of previously undeveloped land, including soil resources, habitats and ecological links between biodiversity assets. Fragmentation of the ecological network is likely to be a long-term significant adverse effect. Should biodiversity net gain and landscape-scale ecological enhancements be effectively implemented, there is potential for this effect to be temporary and beneficial in the long-term.
	Increased greenhouse gas emissions Local Plan policies aim to increase uptake of sustainable transport and active travel, as well as utilising building design and construction methods to minimise the increase in greenhouse gas emissions related to development. However, the Plan is not expected to fully mitigate these impacts, particularly those related to the occupation of development. An increase in carbon emissions in Newcastle-under-Lyme is likely to be a long-term and permanent significant effect. However, over time, there is potential for technological advances and alternative solutions to reduce this impact to some extent.

Summary of residual adverse effects	
4	Limited access to healthcare/leisure facilities and services A notable proportion of site allocations are located outside of the 5km sustainable target distance to an NHS hospital or over 800m from a GP surgery. Local Plan policies such as PSD6 and IN1, are likely to prevent the loss of existing healthcare facilities and improve access to facilities for some residents. However, the policies would not be expected to fully mitigate the restricted access to healthcare services for sites in more rural settlements in Newcastle-under-Lyme.
	Alteration of landscape character Various Local Plan policies seek to ensure that development proposals maintain and improve the borough's intrinsic rural character and distinctiveness and have regard to the findings of the published Landscape and Settlement Character Assessment (LSCA). However, due to the scale of development proposed with a large proportion in previously undeveloped locations surrounding rural settlements, the development set out in the Local Plan could have the potential to alter Newcastle-under-Lyme's distinctive rural character to some extent.
6	Impacts on sensitive landscapes and the Stoke-on-Trent Green Belt Local Plan policies seek to ensure that Green Belt land will only be released for development when necessary and justified, whilst having regard to the findings of the LSCA. However, it is unlikely that these impacts could be fully mitigated particularly for allocated sites in areas identified as being of a 'high' or 'medium' sensitivity, or sites allocated in areas with a 'moderate' or 'strong' overall contribution to the purposes of the Green Belt. Within these areas, the landscape is unlikely to be able to accommodate new development without significant change.
	Alteration of views Whilst the Local Plan policies provide some protection of visual amenity and views, it is likely a minor residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views for a number of the sites proposed in the Local Plan.
8	Increased risk of urbanisation of the countryside and coalescence The identified need to provide housing and employment in the Plan has led to the proposed allocation of development on previously undeveloped greenfield sites at a number of locations within the Newcastle-under-Lyme. Various policies in the Local Plan seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts, and a residual adverse effect is anticipated. This includes potential for reduced separation between some settlements.
	Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.
10	Increased household waste generation It is difficult for the Local Plan to specifically reduce waste generation within the Plan area. Although national trend data indicates a general decrease in household waste generation over time, the introduction of 8,000 new households is expected to increase waste production to some extent which will impact the capacity of waste management facilities.

Summary of residual adverse effects	
11	Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land, including BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.
	Increased demand for water and wastewater management The increased population within the Plan area would be expected to increase demand on water infrastructure. Although the WCS indicated that Seven Trent Water does not expect water supply infrastructure to be a constraint to development, there is potential for a residual adverse effect in regard to wastewater infrastructure when planned growth is considered in-combination with an increase in sewage production and potential for storm overflow events. It is likely that further monitoring and investment to wastewater infrastructure will be required to accommodate development.

4.2 SA recommendations

- 4.2.1 Throughout the SA process, recommendations have been made to strengthen the Local Plan. As a result, the sustainability performance of the plan has been improved through the ongoing refinement of policies, supporting a process of continual improvement and helping to minimise identified adverse effects.
- 4.2.2 Recommendations generated throughout the SA process were fed back to the NuLBC to inform decision-making as the Local Plan evolved. **Table 4.3** summarises the recommendations made in relation to the Submission version of the Local Plan prior to examination. The recommendations identify measures to mitigate potential adverse effects highlighted during the SA. In many cases, the recommendations informed amendments to the Vision, Strategic Objectives and Local Plan policies, whilst in other instances the Council considered that the matters raised would be more appropriately addressed through supporting evidence, masterplanning, design codes or the planning application process, as reflected in the right-hand column of the table. Following submission, the Local Plan was further amended through the independent examination process, including the Inspector's Main Modifications. Consequently, some policies and site allocations referred to in **Table 4.3** were subsequently removed from the adopted Local Plan.

Table 4.3: Summary of key recommendations made in the SA process and actions taken by NuLBC

Local Plan section	Recommendations	Action taken / NuLBC response
Evidence for climate change (SA1) and flooding (SA5)	It is recommended that the potential impacts of climate change and flood risk on development sites is considered through a Level 2 SFRA.	The SFRA (2024) provides updated information to inform the Plan with regard to flood risk and climate change.
Evidence for water (SA6)	The Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the Plan area, with reference to the Water Cycle Study.	The WCS (2024) provides updated information to inform the Plan with regard to water resources and wastewater infrastructure and recommendations to ensure no detrimental effects on the water environment as a result of the Plan.

Local Plan section	Recommendations	Action taken / NuLBC response
Vision – cultural heritage (SA7)	It is recommended that wording to “ <i>conserve and enhance</i> ” cultural heritage is used within the Vision to ensure this is in alignment with the NPPF.	The vision has been amended to take account of this recommendation.
Strategic Objectives – biodiversity (SA3)	It is recommended that the Strategic Objectives should clearly set out the Council’s intention to conserve and enhance the quality and extent of green and blue infrastructure in the borough, and recognise the multi-functional benefits of doing so, encouraging development proposals to pursue nature-based solutions where possible.	Strategic Objective SO IX (9) has been amended to reflect the wording recommended.
Strategic Objectives – cultural heritage (SA7)	It is recommended that the Strategic Objectives are revised to ensure that reference is made to the conservation and enhancement of the borough’s cultural heritage assets, to ensure that a positive strategy for the historic environment is pursued through the Local Plan.	Strategic Objective XX (13) has been added to ensure the protection and enhancement of the borough’s historic environment.
Policy HOU11 - landscape (SA8)	It is recommended that stronger wording regarding the conservation of the landscape character is included in Policy HOU11, reflecting the wording used in the NPPF.	Policy HOU11 (criteria B) makes reference to the character and appearance of the surrounding area.
Policy RET1 - transport and accessibility (SA11)	Policy RET1 could be strengthened through ensuring that permitted retail/leisure developments outside of the defined centres are accessible via public transport and active travel links.	Additional text has been added to RET 1, criterion 5 to make reference to accessibility via public transport and active travel linkages
Policy RET5 – cultural heritage (SA7)	Policy RET5 could be enhanced through including stronger wording surrounding the town centre’s character and how measures could conserve and enhance the local character.	Text is included in policy RET5, criterion d to refer to conserving and enhancing the town centre character.
Policy EMP3 – landscape (SA8)	Policy EMP3 could be enhanced through including stronger reference to the conservation and enhancement of the landscape character.	Policy EMP3, point 1(a) refers to the type and scale of the proposal being appropriate to its location.
Policy SE11 – biodiversity (SA3) and landscape (SA8)	Policy SE11 could be enhanced through ensuring that appropriate, and preferably native / locally important, species are planted through any new schemes in suitable locations, informed by a qualified ecologist / arboriculturist. This will help to ensure ‘the right tree in the right place’ ²⁵ .	Criterion 1 of policy SE11: Trees, hedgerows and woodland refers to the need for an arboricultural impact assessment and / or a hedgerow surveys.
Policy AB15 and Policy AB33 – water (SA6)	It is recommended that the wording regarding “ <i>an appropriate distance</i> ” from the sewer is more clearly defined for sites AB15 and AB33.	Reference to an ‘appropriate distance’ is considered suitable and is reflective of a need for further detail to be established at planning application stage.
Policy CT20, Policy KL13 and	It is recommended that development within site CT20, site KL13, site MD29 is directed away from areas of the site	As the Plan is intended to be read as a whole, alongside policy SA1 ‘general requirements’ should ensure that this matter

²⁵ Forestry Commission (2022) Urban Tree Manual: The Right Tree in the Right Place for a Resilient Future. Available at: <https://www.forestryresearch.gov.uk/tools-and-resources/fthr/urban-tree-manual/> [Date accessed: 31/05/26]

Local Plan section	Recommendations	Action taken / NuLBC response
Policy MD29 – biodiversity (SA3)	which comprise high habitat distinctiveness.	is appropriately considered at planning application stage.
Policy CT20 – landscape (SA8) and health (SA11)	It is recommended that clearer wording is attributed to <i>“agent of change mitigation may be required at source”</i> to mitigate noise impacts on or from site CT20.	Criterion 5 of policy CT20 refers to consider the relationship of the site to surrounding development in respect of amenity impacts.
Policy KL13 – biodiversity (SA3)	Policy KL13 may benefit from stronger wording to define the word <i>“appropriate”</i> with regards to buffers surrounding SBI and BAS sites.	The reference to appropriate is considered suitable as this is a matter that should be determined at planning application stage.
Policy SP11 – transport and accessibility (SA11)	It is recommended that policy for the four SP11 parcels defines the size of land required for a new primary school.	Reference to the school is considered appropriate at the Plan stage. Further information would be derived when the exact requirements are identified through a future planning application / design code / masterplan.

5 How opinions of consultation bodies and the public have been taken into account

5.1 Consultation responses

- 5.1.1 As set out in **Table 2.1**, the Local Plan has been prepared across a number of iterative stages, accompanied by various SA outputs. At each stage, an SA report was published for consultation with both the statutory bodies (Natural England, Historic England and the Environment Agency) and the public, alongside the Local Plan documents where relevant.
- 5.1.2 The following SA reports have been subject to consultation for the Local Plan:
- SA Scoping Report (May -August 2021);
 - Regulation 18 SA Report (June -August 2023);
 - Regulation 19 SA (August-October 2024);
 - Main Modifications SA (November-December 2025)
- 5.1.3 The responses received at each consultation stage relating to the SA were presented in Appendix C of the Regulation 19 SA Report. A summary of the key responses received at each stage, including those received from the statutory bodies, is provided in sections **5.2** to **5.6**.
- 5.1.4 All consultation responses to the Local Plan and the accompanying evidence base, including comments from the statutory consultees on the Plan itself, can be found on the Newcastle-under-Lyme Local Plan website²⁶.

5.2 SA Scoping Report comments

- 5.2.1 Between May and August 2021, the content of the scoping report was consulted within the statutory bodies Historic England, Natural England and the Environment Agency. **Table 5.1** summarises the key comments received, and actions taken.

Table 5.1: Consultation on the SA Scoping Report (2021)

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
Environment Agency	Requested stronger consideration of flood risk and climate change adaptation, blue-green infrastructure and ecological connectivity, water quality improvements, and sustainable waste management, including strengthened assessment criteria and alignment with relevant environmental policies and evidence.	These matters were addressed through the Scoping Report and relevant SA Objectives, with flood risk and water quality considerations incorporated into the methodology for assessing reasonable alternative sites. Blue-green infrastructure and ecological connectivity were reflected in the assessment framework, although site-level assessment was constrained by limited available data.
Historic England	Requested stronger consideration of the historic environment, including heritage assets, historic landscapes and townscapes, relevant evidence	These matters were addressed through the Scoping Report and assessment framework, with heritage considerations incorporated into

²⁶ Newcastle-under-Lyme (n.d) *Local Plan examination*. Available at: <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-examination/3?utm> [Accessed: 050626]

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
	and guidance, and the identification, mitigation and monitoring of potential effects.	the baseline evidence, sustainability objectives and assessment methodology. Potential effects on the historic environment were considered through the SA process, with mitigation and monitoring measures identified where appropriate.
Natural England	Requested consideration of relevant natural environment plans and strategies, including green infrastructure, biodiversity, Public Rights of Way, shoreline and river basin management plans, and landscape strategies. Also requested strengthening of biodiversity and climate-related objectives, including protected sites, greenhouse gas emission, and appropriate monitoring indicators.	These matters were addressed through the Scoping Report and updated review of relevant Plans, Policies and Programmes, with SA objectives updated to reflect greenhouse gas emissions and biodiversity considerations, including protected sites. Relevant monitoring indicators relating to green infrastructure and soil were incorporated into the SA framework where appropriate.

5.3 Regulation 18 SA

5.3.1 The Regulation 18 SA was published for public consultation alongside NuLBC's 'First Draft Local Plan' between 19th June and 14th August 2023. **Table 5.2** provides a summary of some key responses raised and how these were considered in the SA process going forward.

Table 5.2: Consultation on the Regulation 18 SA (2023)

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA	Incorporation into the SA
Comment ID SA2	Objected to the proposed site allocation on grounds including impacts on the Green Belt, insufficient infrastructure capacity, increased traffic congestion, and potential air quality effects.	Comments did not directly relate to the SA. Site selection and rejection was undertaken by the Council, informed by the SA findings and wider evidence base, with the latest decisions set out in the Regulation 19 SA.
Comment ID SA3	General Comment – “ <i>There is a total bias towards building on green belt land and also in Audley. This is totally unacceptable and unnecessary.</i> ”	Not a specific comment on the SA.
Comment ID SA5	Objection – “ <i>Air pollution is always bad. Especially at peak commute times</i> ”	Not a specific comment on the SA.
Comment ID SA6	Objection – “ <i>I object to these proposals. It will have a negative effect on the environment, doctors waiting lists, wildlife in the area and air quality to name a few.</i> ”	Not a specific comment on the SA.
Comment ID SA7	Objected to the proposed site allocation due to concerns regarding insufficient infrastructure to support development, impacts on the Green Belt, adverse effects on wildlife, and increased traffic impacts.	Comments did not directly relate to the SA. Site selection and rejection was undertaken by the Council, informed by the SA findings and wider evidence base, with the latest decisions set out in the Regulation 19 SA.

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA	Incorporation into the SA
Comment ID SA8	Raised concern that lack of specified access routes for the proposed major allocation prevents a full assessment of sustainability impacts, noting that different access options could have significantly different effects on landscape, natural environment, air quality, and public amenity, and requesting that access details be identified and assessed before inclusion of the allocation in the Local Plan.	The SA provided a high-level, comparative assessment of reasonable alternative sites using secondary data. The Council will use the SA findings alongside other evidence base information, including site-specific access and transport evidence, to inform the selection and rejection of alternatives, with the latest decisions set out in the Regulation 19 SA.
Comment ID SA9	Raised concern that the proposed housing allocation would potentially incorporate or impact the historic trackway/public highway known as Bell's Hollow, and that the Sustainability Appraisal does not appear to assess adverse effects on this historic landscape feature or its access function, despite the site being selected for inclusion in the Local Plan.	The SA is a high-level assessment based on secondary data, and no information on ancient landscape features was provided by the Council to inform the assessment. Since the Regulation 18 stage, the boundary of Site CT1 has been amended to exclude the referenced road; the revised site has been assessed as a reasonable alternative in in the Regulation 19 SA.
Comment ID SA13	Expressed strong objection to the draft Local Plan site allocations, particularly NC13 (Land West of Bullocks House Road, Harriseahead), with detailed concerns raised (not reproduced).	Comments did not directly relate to the SA. Site selection and rejection is undertaken by the Council, informed by the SA and wider evidence base, with the latest selection and rejection information set out in the Regulation 19 SA.
Comment ID SA14	Raised concerns that the proposed development would increase traffic and congestion, particularly on the A34 and surrounding local roads, with associated increases in carbon emissions, and would place additional pressure on local healthcare services, including GP capacity and appointment availability.	No specific comments were made on the SA. The information provided is considered as part of the contextual and baseline information set out in the Regulation 19 SA Main Report (Volume 2), which informs the SA assessments.
Comment ID SA 15	Supported the Sustainability Appraisal and need for a robust Local Plan, including difficult decisions such as Green Belt release where necessary, recognition of housing need and demographic change, and provision of appropriate housing types (including older persons' housing) to support housing mobility and address supply shortfalls.	Not a specific comment on the SA.
Comment ID SA16	Raised objection to site allocation NC13 on grounds including presence of marshland, loss of wildlife habitat and Green Belt leading to urban sprawl, protected species concerns referenced in the HRA, reduced public transport provision, limited GP capacity, and insufficient local infrastructure including schools and other facilities.	Comments did not directly relate to the SA. Site selection and rejection is undertaken by the Council, informed by the SA and wider evidence base, with the latest selection and rejection information set out in the Regulation 19 SA.

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 18 SA	Incorporation into the SA
Comment ID SA17	Raised objection to site allocation NC77 on grounds including mine shaft subsidence risk and development safety concerns, identified high-risk designation in Council evidence, loss of wildlife habitat and Green Belt with potential urban sprawl, protected species concerns referenced in the HRA, reduced bus service provision, limited GP capacity, lack of local facilities (including schools), potential access point outside the Borough, cross-boundary issues with Stoke-on-Trent Council, insufficient consultation with neighbouring authority, presence of trees and wildlife on the Newcastle section of the site, and loss of public footpaths.	Comments did not directly relate to the SA. Site selection and rejection is undertaken by the Council, informed by the SA and wider evidence base, with the latest selection and rejection information set out in the Regulation 19 SA.
Natural England	Noted reference to Policy PSD7 and the use of green/blue infrastructure for air quality benefits, but highlighted that while vegetation can help reduce air pollution when appropriately designed, it may also exacerbate air quality issues if poorly designed, with reference provided to supporting technical guidance.	The updated policy assessments are set out in the Regulation 19 SA, with Natural England's comments considered, particularly in relation to Policy PSD7 and other relevant policies, including the role and limitations of green infrastructure in delivering air quality benefits.
Historic England	Requested inclusion of a specific strategic objective and indicators for the historic environment within the Plan and SEA, and urged consideration of heritage impacts when determining development locations and distribution, including through the assessment of reasonable alternatives to avoid or minimise harm to heritage assets in line with the SEA process.	The Regulation 18 SA recommended revising the Strategic Objectives to include conservation and enhancement of the borough's cultural heritage. The Strategic Objectives were subsequently revised by NuLBC and re-assessed in the Regulation 19 SA, noting that this was a high-level assessment and that full effects may only be determined at the detailed planning application stage.
Environment Agency	No direct comments received regarding the SA.	N/A

5.4 Regulation 19 SA comments

5.4.1 The Regulation 19 SA was published for public consultation alongside NuLBC's 'Final Draft Local Plan' between August and November 2024. **Table 5.3** provides a summary of some key responses raised and how these were considered in the SA process, some of which were discussed during the examination hearings.

Table 5.3: Consultation on Regulation 19 SA (2024)

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 19 SA	Consideration in the SA
Comment ID NULLP382 NULLP1305	Requested clarification on why Site AB2 is identified as having a positive impact in Table N15,	Table N.15 of the SA Non-Technical Summary provided an overview of site assessment findings, and that Site AB2 was identified as having few constraints to low

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 19 SA	Consideration in the SA
	specifically in relation to economic effects and climate change impacts.	and zero carbon technologies and was expected to deliver a net increase in employment floorspace. These factors were assessed as resulting in positive effects for SA Objective 1 (Climate Change) and SA Objective 12 (Economy), in line with the methodology.
Comment ID NULLP382 NULLP1305	Noted that Site Variation AB2A had not been assessed within the Sustainability Appraisal.	All reasonable alternative sites had been identified by NuLBC and assessed through the SA process, with Site AB2 assessed at Regulation 18 (69.91ha) and an updated version assessed at Regulation 19 (78.37ha).
Comment ID NULLP382 NULLP1305	Noted that Tables N10 and N11 identified growth options, with Option 6D performing more favourably in terms of outcomes, and that this option did not include Site AB2.	All reasonable alternatives, including growth scenarios 6a and 6d, had been identified by NuLBC as plan-makers and assessed through the SA, with findings informing the Council's decision-making and selection/rejection of options alongside other evidence base information. It was noted that, although Growth Scenario 6d performed favourably in the SA and did not include Site AB2, options 6b and 6d performed similarly against the high-level SA methodology. Growth Scenario 6d was not selected by NuLBC because development of Site TK30, which formed part of that option, was not considered appropriate at that time.
Comment ID NULLP670	Requested that the SA be updated to take account of the draft National Planning Policy Framework (NPPF) and the revised Local Housing Need methodology, which indicated a requirement of 593 dwellings for Newcastle-under-Lyme.	The Regulation 19 Local Plan and accompanying SA were prepared in accordance with the NPPF as published at the time of preparation (September 2023), and noted that any further reasonable alternatives identified by the Council could be assessed through the SA process.
Comment ID NULLP771	Noted that the July 2024 Sustainability Appraisal indicated that Site LW53 performed marginally better than Site LW54 in the assessment scoring.	All reasonable alternative sites identified by the Council had been assessed through the SA process, with findings used to inform decision-making, and that the Council's reasons for selecting Site LW53 and rejecting Site LW54 were provided in Appendix I of the Regulation 19 SA.
Comment ID NULLP 1285	Acknowledged that a Sustainability Appraisal had been undertaken to evaluate different growth options, assess their impacts, and identify residual effects based on social, economic, and environmental parameters.	Commends noted.

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 19 SA	Consideration in the SA
Comment ID NULLP SA1	Objection to Green Belt release.	All reasonable alternative sites, including both Green Belt and non-Green Belt locations, had been identified by NuLBC and assessed through the SA process, with findings used to inform the Council's decision-making on the selection and rejection of options.
Comment ID NULLPSA4	Raised concerns that Table F.1.1 and related sections of the SA were confusing and inconsistent in their presentation of Site AB2 between Regulation 18 and Regulation 19 stages, particularly regarding site area, developable employment land, and floorspace figures. It noted that while the site expanded from 69.91ha to 78.37ha (78.31ha stated elsewhere) and was intended to provide greater Green Infrastructure, the reference to 22ha was misleading as it related to 220,000 sq m of floorspace rather than land area. It also highlighted inconsistencies in Appendix J.2, including differing site area figures and incorrect references to financial contributions for schools and health facilities, which were not considered applicable to an employment allocation.	Table F.1.1.1 used colour-coding to distinguish new, amended, and previously assessed sites, and confirmed that all site specifications, including land use and size, were provided by NuLBC. It clarified that Policy AB2 allocated approximately 22ha of employment floorspace, which was consistent with the SA's reference to developable employment area. It also confirmed that references to schools and healthcare contributions in paragraph J.2.2.7 were included in error and did not affect the assessment.
Comment ID NILLPSA3	Requested that a fourth reasonable alternative be included and assessed for the housing growth options, representing a higher growth scenario.	All reasonable alternatives, including housing growth options, had been identified by NuLBC and assessed through the SA, and noted that any further reasonable alternatives identified by the Council could be evaluated through the SA process.
Comment ID NULLPSA3	Noted that no reasonable alternative had been identified which considered development of a larger scale around rural centres.	PPG does not prescribe what constitutes reasonable alternatives for a plan. The sequencing, types, and number of alternatives may vary. It was noted that any further reasonable alternatives identified by the Council could be assessed through the SA process.
Comment ID NULLP SA2	Raised concern that Page N53 of the SA incorrectly stated that there were no NHS hospitals with A&E services within the borough, noting that the A&E at Royal Stoke Hospital is located within the borough, and that this factual inaccuracy undermined confidence in the Sustainability Appraisal.	Clarified that the Royal Stoke University Hospital is located adjacent to the Newcastle-under-Lyme Borough boundary but lies within the administrative area of Stoke-on-Trent.
Natural England	Set out that the SA was a comprehensive document and that Natural England's comments had been incorporated throughout the response. It also noted that the SA recognised the distinctiveness of the Plan area.	Comments noted.

Consultee / NuLBC comment ID	Summary of consultation responses to the Regulation 19 SA	Consideration in the SA
Historic England	No direct comments received regarding the SA.	N/A
Environment Agency	No direct comments received regarding the SA.	N/A

5.5 Main Modifications SA comments

- 5.5.1 The NuLBC Local Plan 2020-2040 was submitted to the Secretary of State for Independent Examination in December 2024. Examination Hearing Sessions were held between May and June 2025. Following the hearings, the Inspector identified a number of Main Modifications that were necessary to make the Plan sound and legally compliant.
- 5.5.2 Consultation on the Schedule of Proposed Main Modifications, accompanying SA and HRA was undertaken between November and December 2025.
- 5.5.3 Representations were received during the Main Modifications consultation, including comments from National Highways on the SA. National Highways agreed that the Main Modifications did not materially alter the conclusions of the SA, particularly in relation to transport impacts and the Strategic Road Network. The comments were noted by the Council, and no further changes to the Plan or SA were considered necessary.

5.6 Comments on the NuL Local Plan

- 5.6.1 The Statement of Consultation²⁷ sets out how the Newcastle-under-Lyme Borough Local Plan 2020–2040 has been prepared in accordance with the consultation requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It summarises the stages of consultation undertaken, including who was consulted and the methods used, and provides an overview of the main issues and representations received from stakeholders, statutory consultees and members of the public. The document also explains how these representations have informed the evolution of the Local Plan, demonstrating that the preparation process has been transparent, inclusive and responsive, and that the legal requirements for public participation were met prior to submission for independent examination.
- 5.6.2 Summaries of consultation responses and supporting examination documents are available on the Council's Local Plan webpages and within the Examination Library prepared as part of the independent examination process.
- 5.6.3 Overall, the consultation process has played an important role in refining both the Newcastle-under-Lyme Borough Local Plan 2020–2040 and the accompanying SA.

²⁷ Newcastle-under-Lyme Borough Council (2024) First Draft Local Plan Regulation 18 Consultation Report. Available at: <https://moderngov.newcastle-staffs.gov.uk/documents/s41761/Appendix%201%20Consultation%20Report.pdf?> [Date accessed: 11/06/26]

- 5.6.4 Responses from statutory consultees, infrastructure providers, community organisations and members of the public have informed updates to the evidence base, strengthened the consideration of key sustainability issues, and contributed to the evolution of policies, site allocations and development management approaches. The SA has provided a structured framework through which these representations have been considered, ensuring that consultation outcomes have been incorporated in a transparent and proportionate manner throughout plan preparation.

6 How the environmental and sustainability effects of the plan will be monitored

6.1 Monitoring

- 6.1.1 The SEA Regulations require that significant effects resulting from the implementation of the plan should be monitored. SEA Regulation 17 states that:
- 6.1.2 *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.*
- 6.1.3 The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework focuses on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.
- 6.1.4 Monitoring the impacts of the Local Plan should seek to answer:
- Was the likelihood of sustainability impacts identified in the SA process accurate?
 - Is the Local Plan successful in achieving its desired sustainability objectives?
 - Are mitigation measures performing as expected?
 - Are there any unforeseen adverse impacts of the Local Plan, and are these within acceptable limits or is remedial action required?
- 6.1.5 Monitoring proposals for the Local Plan, as presented in the Table 17.1 of the Regulation 19 SA report, are set out in **Table 6.1**.

Table 6.1: Monitoring proposals for the Local Plan as presented in the Regulation 19 SA Report

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Air	AQMAs	Annually, Plan area wide	Decrease
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of Planning Approvals granted contrary to the advice of Natural England or Staffordshire Wildlife Trust	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Renewable energy generation	Annually, Plan area wide	Increase

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Climatic factors	Fluvial flood risk along Lyme Brook	Annually, Plan area wide	Decrease
Climatic factors	Surface water flood risk within Newcastle-under-Lyme and Kidsgrove	Annually, Plan area wide	Decrease
Cultural heritage	Number of Conservation Area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP Surgeries	Annually, Plan area wide	Increase
Landscape	Quantity of development in the open countryside	Annually, Plan area wide	Zero
Landscape	Change in tranquillity in the open countryside	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in Newcastle-under-Lyme within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste generation	Annually, Plan area wide	Decrease
Population and material assets	Loss of Mineral Safeguarding Areas	Annually, Plan area wide	Zero
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
Soil	Number of dwellings built on BMV land (Grades 1, 2 or 3a ALC)	Annually, Plan area wide	Decrease
Water	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero
Water	Quality of watercourses	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

6.1.6 The monitoring suggestions set out in **Table 6.1** identify potential indicators and topics to track the environmental, social and economic effects of the Local Plan, in line with the requirements of the SEA Regulations. These indicators cover a range of sustainability issues, including air quality, biodiversity, climate change, flood risk, cultural heritage, health, landscape, housing, economic performance, soil resources and water quality. The monitoring suggestions were developed to help identify any significant adverse effects arising from implementation of the Plan and to assess whether mitigation measures are operating effectively.

- 6.1.7 The proposed indicators are intended to inform the Council's overall approach to monitoring and help ensure that the implementation of the Local Plan can be assessed in terms of its sustainability outcomes. Monitoring will be undertaken through the Council's established monitoring arrangements and relevant evidence sources, enabling progress towards the Plan's objectives to be assessed, identifying whether policies are achieving their intended outcomes, and providing an evidence base for future reviews where necessary. Monitoring will also assist in identifying any unforeseen adverse effects and whether additional mitigation measures may be required during the Plan period.

Habitats Regulations Assessment

Sustainability Appraisal

Strategic Environmental Assessment

Landscape Character Assessment

Landscape and Visual Impact Assessment

Green Infrastructure

Expert Witness

Ecological Impact Assessment

Habitat and Ecology Surveys

Biodiversity Net Gain



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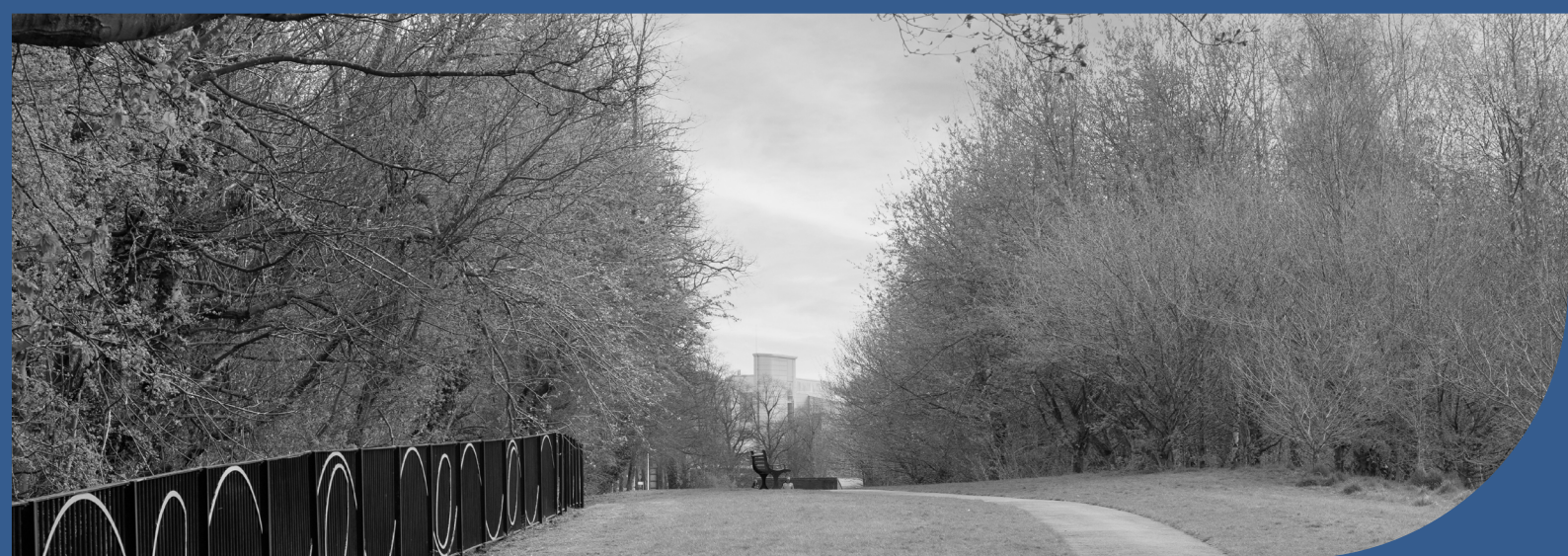
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