



Green Belt Technical Paper

1. Introduction

1.1 This paper sets out the technical evidence to support the information on Green Belt release that is presented in the Joint Local Plan Preferred Options Consultation document.

2. Strategic Growth Scenarios Selection

2.1 At the Strategic Options consultation stage during summer 2017 the authorities consulted on 4 Growth Scenarios in terms of the quantum of development to be planned for (2013-2033) as the JLP progresses.

Strategic Growth Option for Housing

2.2 The Housing Technical paper considered the appropriateness of each growth option and concluded that there are risks associated with options A and B with regards to their consistency with national policy and being positively prepared. These options also received the lowest levels of support at the Strategic Options consultation.

2.3 Growth Option C was considered to be positively prepared and realistic as evidence indicates that the level of growth associated with the option had been achieved previously and is therefore aspirational and deliverable. It would also serve to address objectively assessed needs (OAN). The sustainability appraisal highlighted that any potential negative effects associated with this option could have more potential for mitigation and the public consultation responses identified a broader consensus of support for this option.

2.4 in respect of Growth Option D 47% of the consultation responses received favoured this option. However, this was largely the view of the development industry, and therefore does not represent a broad consensus to responses received from residents. While the option is considered to be positively prepared and consistent with national policy, its effectiveness (as this level of growth has never been achieved previously), and justifiability (due to the availability of evidence relating to the high growth scenario) are unsupported.

2.5 On balance, taking into account the housing need and land supply evidence the Housing Technical paper identifies Option C as the preferred growth option. The sustainability appraisal also supports the selection of this option over the alternative options (see tables 1 and 2).

Strategic Growth Option for Economic Development

2.6 The Employment Technical paper concluded that scenarios A and B would not serve to meet the objectively assessed needs for economic development; nor would they provide the qualitative mix of employment land and B class uses, and therefore there is a risk that

developers will look elsewhere outside the Plan Area for future employment sites. Consequently new and existing opportunities for business growth would be undermined; job growth would not be prioritised; would constrain competitiveness. However, these options would have no harm to Green Belt, limited impact on open countryside, and natural/historic environment.

2.7 Growth scenario C corresponds to the identified need for the quantum of employment land as set out in the SHMA Review 2017 and the Employment Land Review (2015) (ELR). Critically it would drive and support economic growth also enable the qualitative mix of employment land and B-class uses to be provided as identified in the ELR. At the same time it represents a positive increase in delivery, a realistic uplift on past trends, whilst growth appears more evenly spread across the various employment sectors. This increase in delivery, whilst considered aspirational, is still considered deliverable. Nevertheless providing sufficient employment land of appropriate quality and in the right locations to attract investment and support job creation would have some harm on the Green Belt or open countryside, and natural or historic environments.

2.8 Scenario D would seek to deliver wider ambitions for economic growth, supporting and boosting jobs and business growth but is not considered to be as realistic as Scenario C as it would require much higher levels of net inward migration than historically have been achieved; whilst this would address the imbalance occurring through an ageing local population it would place greater demands on infrastructure, high building rates, (particularly for housing, the level of which have not been achieved previously), significantly in excess of the assessed need for housing and employment land. It would also require substantial development within the Green Belt or open countryside, along with an even greater need for more housing land to house the increased workforce and balance housing and employment growth.

Conclusion

2.9 Having taken into account the conclusions reached, with regards to the growth options, in the housing and employment technical papers, it is considered that Options A and B would not serve to meet the objectively assessed needs for development and these options are not considered to be positively prepared or justified. As such it is considered that the progression of either one of these options would likely result in the Joint Local Plan being found unsound¹ at examination in public.

2.10 Due to the unrealistic and high building rates required to achieve Option D, the level of which have never been achieved before, this would also risk the soundness of the plan in terms of its deliverability (effective), as well as not being the most appropriate strategy. Option C would see an increase in delivery sufficient to be considered aspirational while also at a level that evidence suggests is deliverable.

2.11 The findings of the sustainability appraisal (see tables 1 and 2 below) support Option C, and while Options A and B received the lowest level of support at the strategic options consultation stage. Option D received the most support from the development industry compared to the alternative options. However, Option C still received some support (16.4%)

¹ NPPF - Examining Local Plans (Paragraph 182)

and is considered to represent the most balanced option when considering the responses to the alternatives.

Table 1: Growth Scenario Options: Sustainability Appraisal Findings Summary²

Growth Scenario:	Summary of Sustainability Appraisal Findings:
<p>A: Carry forward the existing levels of growth set out in the Core Spatial Strategy (17,100 new homes and 249 hectares of employment land required 2013-2033)</p>	<p>Most of the scores for this scenario are dependent on implementation. In particular how the levels of development will be delivered through planning policies and site selection. Recommended mitigation measures include having policies to ensure that development increases efficiency of energy and water usage and waste treatment, protection and enhancement of historic and natural environments and ensuring that infrastructure and services are provided to support the levels of development proposed. Some negative scores were attributed, particularly in regard to meeting housing needs as this scenario is not based on the up to date evidence provided in the SHMA.</p>
<p>B: Support our existing natural population growth (21,680 new homes and 180 hectares of employment land required 2013-2033)</p>	<p>Most of the scores for this scenario are dependent on implementation. In particular how the levels of development will be delivered through planning policies and site selection. Recommended mitigation measures include having policies to ensure that development increases efficiency of energy and water usage and waste treatment, protection and enhancement of historic and natural environments and ensuring that infrastructure and services are provided to support the levels of development proposed. Less negative scores were attributed compared with Scenario A as it will help to meet the housing needs arising from natural population growth but it won't help to drive economic growth.</p>
<p>C: Support our economic growth (27,800 new homes and 199 hectares of employment land required 2013-2033)</p>	<p>There is a greater mixture of scores for this scenario than scenarios A and B. There are more negative scores against some of the environmental objectives due to increased development pressure, however more positive scores are now also being introduced against social and economic objectives, particularly in regard to providing housing choice and meeting the housing needs of the whole community. As in the earlier scenarios, the negative impacts are recommended to be mitigated against through appropriate planning policies and the selection of appropriate sites for development.</p>
<p>D: Maximise our economic potential (36,280 new homes and 258 hectares of employment land required 2013-2033)</p>	<p>Many of the scores for the environmental objectives were identified as negative due to the effect that higher levels of development are likely to have on the environment of the plan area. Under this scenario it becomes critically important for planning policies and the selection of sites to ensure that there are no impacts on the environment or that any impacts are at least minimised and compensated against. There are also positive scores under this scenario relating to improved housing choice, shopping and commercial services and having a range of employment land and premises. There are also objectives relating to community and transport infrastructure in particular that are dependent on implementation through planning policy and site selection which will impact on sustainability.</p>

² Sustainability appraisal Strategic Options stage - pages 32 and 33 of the main SA report

Table 2: Summary Findings of the Sustainability Appraisal for the Preferred Options (Preferred Growth Option)³

Preferred Option	Description	Summary of Sustainability Appraisal:
Preferred Growth Option	<p>The Preferred Options Consultation document sets out the following preferred option for growth:</p> <p><i>“The preferred option for growth is to deliver the Objectively Assessed Need of a minimum of 199 hectares of employment land and 27,800 new homes between 2013 and 2033 (1,390 new homes per year) as a minimum across the plan area, with some potential uplift to help to deliver wider economic aspirations, flexibility and choice where they can be demonstrated to be deliverable during the plan period”</i></p>	<p>As this is a high level preferred option, determining the impact on the sustainability objectives is largely dependent on further information about how development will be accommodated, i.e. the location, type and form of development. This Preferred Growth Option does however have major positive effects identified against the objectives to provide housing choice and help meet the housing needs of the whole community and to provide a range of employment land and premises. Most of the comments and mitigation measures identified against the objectives relate to having appropriate planning policies and the selection of sites that will manage development and eliminate or minimise any potential impacts on energy use, air quality, biodiversity and the natural environment, site remediation, flood risk, the historic environment, green space, waste generation and treatment, city and town centres and wider infrastructure such as transport networks, water infrastructure and community services and facilities. These will all need to be addressed as the preferred level of growth is taken forward in the Draft and Final versions of the Joint Local Plan.</p>

3. Broad Locations for Future Housing & Economic Development

3.1 At the Strategic Options consultation stage the councils consulted on 6 Spatial Growth Options presenting potential strategies to accommodate future growth (2013-2033). It should be noted that the appropriateness of a particular broad location option is influenced by the quantum of development need to be provided according to preferred Strategic Growth Option C (27,800 dwellings and 199 hectares (+15% buffer to help deliver wider economic aspirations, and give flexibility and choice for the Market) of employment land. This partly reflects the fact that some employment sites may well be lost to alternative uses prior to the adoption of the Joint Local Plan.

3.2 To achieve the Preferred Development Strategy and the Preferred Growth Option, it is essential that housing and employment development are balanced and delivered in a complementary way. Ensuring people have access to a good quality housing offer which provides a range of choice, and is located close to their place of work within the plan area therefore underpins the preferred growth strategy. This alignment will provide homes for the

³ Sustainability Appraisal Report Preferred Options stage - pages 21-28 of the main SA report.

workforce to mitigate the risk of local employers being unable to recruit appropriately qualified and skilled people, which in turn has the potential to constrain economic growth and limit the jobs available.

Broad Locations for Future Housing

3.3 The Housing Technical paper concludes that at present the overall potential capacity to be obtained from broad location options 1 to 4 (within the existing urban area) is 23,503 dwellings - 85% of the housing market area's needs (see appendix 1). It goes on to explain that with regards to Newcastle-under-Lyme these options have the potential to provide 6,611 dwellings (56% of the Borough's total housing need). As a result none of these 4 options appear able to provide for the needs of the plan area or, more specifically, the needs of Newcastle-under-Lyme as Option 4 has the potential to provide for Stoke-on-Trent's housing need. Therefore the Housing Technical paper proceeds on the basis that additional capacity is required from areas beyond the existing urban area either under broad location Option 5 or 6.

3.4 The Housing Technical paper explores these options and concludes that the preferred approach to accommodate the majority of the outstanding housing need is under broad location option 6. The preferred approach to concentrate a proportion of the outstanding development need at locations able to form strategic scale developments is informed by the findings of the sustainability appraisal (see tables 3 and 4 below), and the potential to provide simultaneous social, economic and environmental benefits.

Broad Location Options for Future Economic Development

3.5 The Employment Technical Paper concludes that whilst Broad Location Options 1, 2 and 4 identify a sufficient supply of land for employment development to meet identified quantitative needs across the plan area as a whole, they offer a finite supply of sites within the urban, suburban, village locations for both employment and housing development. This means that the OAN for the plan area cannot be met in its entirety and the potential to accommodate a larger local workforce to support the projected economic growth is limited.

3.6 These options would force all employment development to urban locations where the high costs of bringing sites forward may constrain development taking place, and there would be competition for this finite supply of sites for alternative uses such as housing. These sites may limit the appropriate locations for the qualitative range of different B-class employment uses that are needed to deliver the step change in the local economy. Broad Location Option 3 presents a significant undersupply of employment land, therefore would not meet the OAN and also not deliver the land to provide the range of B-class employment uses needed. These Broad Location Options would therefore not be able to meet the Preferred Growth Option across the Housing and Functional Economic Market Area.

3.7 Broad Location Options 5 and 6 provide greater choice of a range of sites and provide enough land to meet needs for housing; enough land to meet both quantitative and qualitative needs for employment land.

3.8 The Employment Technical Paper explores this in greater detail; and concludes that on balance Broad Location Option 6 is preferred as there is greater potential to achieve simultaneous social, economic and environmental benefits through larger scale and more

focused strategic allocations. It also provides greater opportunity to mitigate any adverse impacts through the application of appropriate planning policies; it also provides a suitable choice of locations for employment development to allow the clustering and networking of industries and be in reasonably close proximity to housing development, thereby allowing good access to a local workforce and reducing the need to travel. The Sustainability Appraisal identified potentially positive scores for the ability to meet and exceed needs for employment land under this Broad Location Option, along with greater opportunity to mitigate any potentially negative effects through appropriate site selection, policies and other interventions would be required, e.g. investment in the transport network and policies to protect existing centres, services and facilities.

Conclusion

3.9 It is clear from the Housing and Employment technical papers that Options 1-4 are not able to produce the sites/capacity required to accommodate the area's development needs. Whilst Option 4 at Strategic Options consultation was indicated to have the potential to provide 23,900 new dwellings (subsequent monitoring has revised this potential capacity down to 23,503 as indicated in appendix 1), this equates to 85% of the number of dwellings required according to housing need. Options 1-4 are also unable to produce the range of opportunities required to meet needs overall. Therefore Options 1-4 on their own are not considered to be positively prepared or effective.

3.10 Whilst Option 5 and 6 could both provide more than enough land to meet development needs, it is considered that Option 6 is preferable particularly due to the benefits associated with strategic scale allocations (potential to achieve simultaneous social, economic and environmental improvements) being greater than that of a less focused more dispersed approach. The sustainability appraisal also highlights the advantages of Option 6 compared with Option 5. Therefore Option 6 is considered to be the most appropriate strategy.

3.11 While this section has explained the selection of Option 6 as the preferred option the technical papers and the Sustainability Appraisal suggests that the extent to which this option can return simultaneous sustainability benefits and reduce / mitigate potential harm is influenced by the location of the land and its characteristics e.g. connectivity, availability of social and physical infrastructure.

Table 3: Broad Locations for Future Housing & Economic Development: Sustainability Appraisal Findings Summary⁴

Broad Location Option:	Summary of Sustainability Appraisal Findings:
Option 1: Continue with the Existing Strategy	As a continuation of the existing development strategy set out in the Core Spatial Strategy, this option is highly dependent on an associated policy framework for it to be considered sustainable. A significant major negative score has been given to the objective to provide housing choice and meet the housing needs of the whole community. This is because this option does not meet the objectively assessed need for housing identified in the SHMA (Growth Option C). It does however have potential to meet the objectively assessed need for employment land.
Option 2: Urban Focus	This option has positive scores against the social and economic SA objectives. This is due to the more centralised nature of this option which helps to support existing centres, services, facilities and infrastructure. It also reduces the need to travel. A significant major negative score has been given to the objective to provide housing choice and meet the housing needs of the whole community, because this option does not meet the objectively assessed need for housing identified in the SHMA (Growth Scenario C). Many of the environmental objectives are dependent on implementation through planning policy before an effect can be determined.
Option 3: Suburban Focus	This option scores negatively against several objectives, especially the social and economic objectives. The effect on the environmental objectives are largely either unknown or dependent on implementation. This option would require a lot of investment in supporting services and infrastructure for any improvement to in its sustainability to be seen. Even then, the option does not have the potential to meet the identified housing and employment land development needs.
Option 4: Combined Urban, Suburban and Rural Village	The overall effects resulting from this option are largely dependent on how it is implemented. This particularly relates to concentrating most development close to existing services, facilities and centres and providing new services and infrastructure where development is to be focused in other locations. Larger scale development sites are more likely to be able to support additional service and infrastructure provision under this option. This option falls slightly short of meeting the housing needs identified so further residential development opportunities may need to be sought.
Option 5: Combined (Option 4) + Scattered Development in the Open Countryside and Green Belt.	This is an option of extremes; it would be able to exceed the need for housing and employment development and these are the most notable positive scores that have been attributed. There are also very negative scores relating to carbon use, climate change, air quality, landscape, townscape and transport infrastructure. Other objectives indicate that the scale of potential development under this option will help to support the provision of new services and facilities across the plan area, but this is likely to be to the detriment of existing services and facilities and existing urban and rural centres. Overall this option has the greatest potential for conflict between the sustainability objectives.

⁴ The table is taken from pages 32 and 33 of the SA report which accompanied the Strategic Options consultation (August 2017).

Broad Location Option:	Summary of Sustainability Appraisal Findings:
Option 6: Combined (Option 4) + Major Urban & Rural Extensions in the Countryside and Green Belt	This option would be able to exceed the need for housing and employment development and these are the most notable positive scores that have been attributed. Most of the other sustainability objectives have been assessed as dependent on implementation. This is because there is potential for development under this option to support the achievement of most of the objectives but policies, site selection and other interventions would be required. In particular, investment in the transport network would be required along with policies to protect existing centres, services and facilities. This option may allow for larger scale development in more viable locations to make financial contributions to support the sustainability of development within less viable locations elsewhere in the plan area.

Table 4: Summary Findings of the Sustainability Appraisal for the Preferred Options (Preferred Growth Option)

Preferred Option	Description	Summary of Sustainability Appraisal:
Preferred Spatial Option	<p>The Preferred Options Consultation document proposes to divide the plan area in to five distinct strategic areas to reflect the wide range of challenges and opportunities that are present in these distinct locations:</p> <ol style="list-style-type: none"> 1 Stoke-on-Trent City Centre and Railway Station 2 Stoke-on-Trent Urban Area 3 Newcastle-under-Lyme and Kidsgrove Urban Area 4 Newcastle-under-Lyme Western Urban Extensions 5 Newcastle Rural Area 	All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying five different strategic sub-areas within the Joint Local Plan, rather than providing detailed information about how policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.

Conclusion: Existing Housing and Employment Land Supply

3.12 The evidence provided in both the housing and employment technical papers indicates that within the existing urban areas there is insufficient land available to provide for the needs of the Joint Local Plan area, without Green Belt release. It is evident that the available land supply within Newcastle-under-Lyme is the limiting factor towards accommodating the Joint Local Plan area's development needs as Stoke-on-Trent are able to meet their own apportionment of the Plan's OAN, with the exception in B1a/b employment land, where there is a deficiency. Green Belt release is, therefore, required to achieve a step change in the economy.

4. Local Authority Development Needs

4.1 Newcastle-under-Lyme and Stoke-on-Trent City Council share a Housing Market Area (HMA) and Functional Economic Market Area (FEMA). Therefore the evidence base in respect of both authorities reflects this relationship. However, while there is some commonality between the two administrative areas, there are also a number of issues on which the two areas differ and a split administrative boundary approach to the evidence base is necessary in order to ensure the needs of each local authority area are taken into account individually. Therefore the SHMA and ELR both assess development need as a plan area and for each local authority.

Strategic Market Housing Assessment Review (2017)

4.2 As demonstrated in section 4 Stoke-on-Trent has sufficient land within the existing urban area to accommodate its housing need. However, Newcastle-under-Lyme only has the potential to accommodate approximately 56% of its need within the existing urban area, including capacity to be obtained from extant permissions beyond the existing urban area (i.e. within the Green Belt or beyond the Green Belt boundary). Specifically with regards to the latter, the paper will now to present key elements of the Borough's needs identified in the SHMA Review and Employment Land Review.

Affordability

4.3 The SHMA Review indicates that Newcastle-under-Lyme is affected by worsening affordability which is limiting the ability of younger people to form new households within the Borough. With regards to this issue paragraph 10 of the SHMA Review states [emphasis added]:

Furthermore, it is considered that a small adjustment to the demographic trend-based projection is justified in response to market signals in Newcastle-under-Lyme, which are considered to be indicative of an imbalance between supply and demand. This recognises the worsening trend in house prices and rents – and the impact that this has had on affordability – while acknowledging that, in absolute terms, rents, house prices and affordability rank relatively positively when compared to neighbouring and similar authorities. Reflecting on Inspectors' conclusions on the scale of adjustment necessary to respond to market signals, it is considered that an uplift of 5% is an appropriate, proportionate and reasonable response to this limited worsening observed in Newcastle-under-Lyme. No uplift is considered to be required in Stoke-on-Trent, given the low cost of housing and evidence of a less acute affordability pressure. Applying these adjustments as necessary indicates a slightly higher need for 1,084 dwellings per annum across the HMA.

In addition, paragraph 2.63 of the SHMA Review states [emphasis added]:

Given the conclusions of the SHMA – and responding to the guidance in the PPG – it is therefore considered that a comparable adjustment to household formation rates is required. Allowing for this positive return to higher levels of household formation for those groups most affected by the worsening affordability of housing is considered important in ensuring that this suppressed market context does not form the basis for future plan-making. This reflects the guidance in the PPG and the conclusions

reached in the SHMA in this regard, and equally aligns with the Government's recently stated intentions to 'create a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and which supports wider economic prosperity'³⁶. Indeed, there is recent evidence that numerous factors – including Government initiatives – are currently supporting a recovery in the number of first-time buyers³⁷, but it is evidently important to ensure that sufficient housing is provided to sustain this recovery.

Affordable Housing Provision

4.4 Table 5.8 of the SHMA Review (2017) below indicates a need for 44 affordable homes per annum to address Newcastle-under-Lyme's existing backlog, following historic under provision, and an annual net new need of 199 affordable homes per annum over a five year period for the Borough. Therefore Newcastle-under-Lyme's total affordable housing need until, the identified backlog is cleared, is 242 affordable homes per annum. This equates to 41% of the local authority's total objectively assessed housing need (586 dwellings per annum), and, once the backlog is addressed, 199 affordable homes per annum thereafter.

4.5 According to the SHMA to provide for Newcastle-under-Lyme's need future housing developments could be expected to provide between 30 and 40% of all new dwellings as affordable housing over the plan period. Were there to be less than the overall recommended housing need provided for within the borough (586 dwellings per annum) it follows that the percentage of affordable housing required could increase i.e. a need for 242 affordable dwellings would represent a greater percentage were a lower number of housing to be provided within the borough. The extent to which the market could provide for this amount of affordable housing as part of new residential development at this stage is unknown. However, to require a level (percentage) of affordable housing might be a factor with regards to the plan being found sound, particularly with regards to the need to demonstrate 'effectiveness' as development viability could be adversely affected by the potential scale of a policy requirement capable of addressing this specific need.

Table 5.8: Stage 7 – Total Affordable Housing Need (Net Annual)

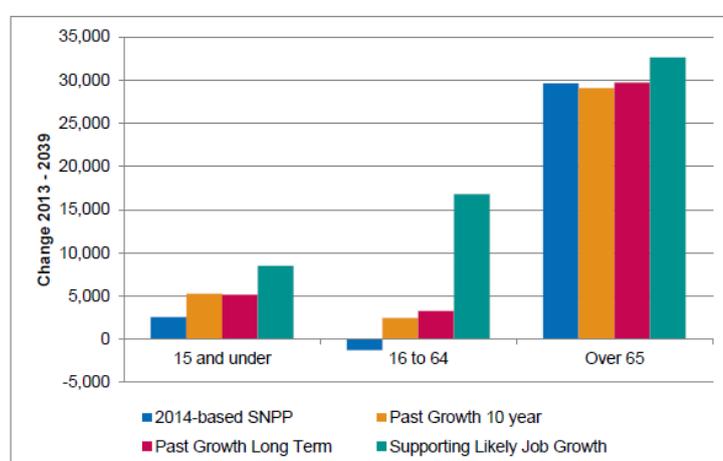
Step	Source	Newcastle-under-Lyme	Stoke-on-Trent	HMA
7.1 Shortfall in affordable housing need to meet current backlog (net annual)	3.3	44	144	188
7.2 Annual net new need	6.3	199	66	265
7.3 Net annual affordable housing need (5 years)	7.1 + 7.2	242	210	453

Demographic Structure

4.6 Evidence in the SHMA Review identifies a need to attract and retain a greater number of young people to re-balance the projected change to the plan area's population structure during the period 2013-2039. With regards to this issue the SHMA Review states:

4.26 The higher level of growth implied by this scenario is underpinned by a more significant growth in the working age population, rebalancing the profile of population growth which would occur if past demographic trends continue (Table 4.1). The following chart illustrates this variation between demographic and employment-led scenarios.

Figure 4.1: Modelled Change in Population by Age 2013 – 2039



Source: Edge Analytics

4.7 While this is an important issue for the Joint Local Plan area as a whole, there is an expectation that housing need specifically assigned to the Newcastle-under-Lyme will contribute towards achieving a balanced demographic restructure (increasing the projected number of residents between the ages of 16 and 64 by 2039) throughout the plan area i.e. both administrative areas will proportionately contain a greater number of this cohort in the future.

4.8 In the event that need is not provided for locally the projected imbalance between the number of residents aged 65+ and those aged 16-64 has potential implications for the Borough's economic competitiveness, by way of a reduced local workforce, increased need to travel for employees of businesses located within the Borough (resulting in negative impacts to the environment, health and economy are commonly associated with this), the ability to support services and facilities and the vitality of the Borough's centres.

Promoting Sustainable Patterns of Development

4.9 In addition to addressing specific issues regarding housing and employment need, the option to accommodate development needs of Newcastle-under-Lyme within the borough has the potential to result in a less dispersed development pattern compared with the alternatives of exporting need to Stoke-on-Trent or another neighbouring local authority. If

possible, accommodating development needs locally, or as much as it is sustainable to do so, would provide existing and future Newcastle-under-Lyme residents with the opportunity to live near to existing and future employment opportunities and services within the Borough. While it is not anticipated that all existing and future residents would chose to do so, it is considered good planning practice to provide for this possibility. To do so would reduce the distances travelled to access employment and services, reducing pressure on transport infrastructure (particularly considering the existing issue of east - west connectivity between Newcastle-under-Lyme and Stoke-on-Trent and the harm to health, the environment and economy experienced from the congestion), and realising the associated sustainability benefits with regards to the environment, health and economy.

Identified Employment Development Needs (Qualitative and Quantitative)

4.10 In addition to what is discussed in Section 3 of this paper, which focused on the quantitative need for employment land, the two tables below set out the summary of the employment land (hectares) in the preferred option by use class and together as a split across 2 blocks of use classes B1a/b and B1c/B2/B8/other:

JLP EMPLOYMENT LAND SUMMARY (Ha)							
	Total (Ha)	B1a	B1b	B1c	B2	B8	Other
Delivered 2013/17	40.93	0.22	1.19	1.60	4.35	33.57	0.00
Committed not Built	115.99	4.56	2.54	17.30	18.23	70.80	2.56
Additional Preferred Sites	60.59	2.28	17.66	18.64	11.07	10.94	0.00
Total	217.51	7.06	21.39	37.54	33.65	115.31	2.56
Percentage	100%	3	10	17	16	53	1

Total	B1a/b	B1c/B2/B8/other
Ha	28.45	189.06
%	13%	87%

4.11 The two tables above and the employment technical paper demonstrate that from a quantitative analysis the Joint Local Plan area is capable of satisfying its employment land need from the supply of sites identified. The paper also indicates that whilst Stoke-on-Trent City Council is able to provide sufficient land to accommodate its employment land needs (growth option C); Newcastle-under-Lyme Borough Council is 18 hectares short of its identified need.

4.12 However, from a qualitative analysis the mix of use classes required from across the B-class uses cannot be met from this identified supply of sites. The mix of B-class use classes from the selected sites clearly indicates a shortfall in the amount of land that is available for B1a/b (office and research and development uses). Without the balance of B class uses that evidence requires the plan to accommodate, the Joint Local Plan would fail to deliver its

vision, aims and objectives, would not deliver the positive step-change in the local economy and furthermore would be unlikely to meet the test of soundness required at examination.

4.13 Whilst there is an opportunity to investigate the ability for existing sites to contribute to redressing this imbalance they are unlikely to deliver the synergistic and cluster affects that could be provided by sites close to universities. Therefore to deliver the Joint Local Plan's aims and objectives there is a need to consider strategic release beyond the existing urban area.

Conclusion

4.14 This section of the report highlights planning considerations and specific components of the Borough's housing and employment development needs for which the consequences of not providing sufficient land locally to accommodate development need are considered to be undesirable. A contributing factor to all of the issues discussed is the constraints which affect the ability of Newcastle-under-Lyme to provide sufficient land for its objectively assessed needs.

4.15 The application of the adopted Joint Core Strategy (2009) today serves to restrict the scope to identify land for development within Newcastle-under-Lyme, which has been a significant factor towards the housing needs identified by the SHMA Review, particularly with regards to the provision of affordable housing, and worsening affordability as a result of demand exceeding supply. If these issues are not addressed locally figure 4.1 of the SHMA Review (see above) indicates that without intervention the projected demographic balance of the area will be significantly more top heavy towards the end of the plan period i.e. proportionately many more residents will be over the age of 65 unless the land supply is able to provide for housing need aligned with supporting likely job growth.

4.16 Without intervention it is considered that the projected increase in the proportion of residents aged 65+ towards 2039 will have adverse implications for the sustainability of the Borough e.g. provision of a local (skilled) work-force capable of attracting and retaining employers, reduced ability to support the area's economy (retail, leisure and centres) and a reduced ability for development to fund infrastructure provision and services.

4.17 The effect of an emerging development strategy that mirrors the existing strategy, under the scenario where the availability of previously developed land and surplus open space in Newcastle-under-Lyme has largely been utilised, is to continue to constrain the provision of development that is required to address the Borough's identified needs i.e. exacerbating affordable housing need, affordability and the unbalanced age structure of the population.

4.18 While development need which cannot be accommodated in Newcastle-under-Lyme without an alternative approach to the existing Core Strategy (5,109 dwellings and 18 hectares of employment land) could potentially be exported this would be on the basis that any exported need would be deliverable, at locations with strong connections to the Borough, and the ability to provide for the Borough's needs (e.g. provision of affordable housing). While this option has the potential to avoid the loss of open space, conflict with Green Belt policy and/or directing significant growth beyond the Green Belt boundary, the implications of not accommodating all, or perhaps a greater proportion, of the Borough's

development need within its administrative boundary would significantly affect the ability to address the issues presented in section 4 of this paper.

4.19 Furthermore, Newcastle-under-Lyme Council has a statutory duty to exercise its function with the objective of contributing to the achievement of sustainable development (Planning and Compulsory Purchase Act 2004). The implications of not being able to provide for the Borough's needs locally is a significant consideration in terms of demonstrating the statutory duty has been fulfilled. It is therefore considered reasonable and appropriate to investigate options to accommodate additional growth within Newcastle-under-Lyme in advance of exporting development need. Moreover, this approach is also considered to accord with paragraph 14 of the NPPF which, for planning-making, requires local planning authorities to positively seek opportunities to meet the development needs of their area.

5. Options to accommodate additional housing and employment need within Newcastle-under-Lyme

Urban area

5.1 While a further Call for Sites exercise will be undertaken alongside the Preferred Options consultation it is not envisaged that this will result in significant additional capacity being identified within the existing urban area as defined by the adopted Core Strategy (2009). This view is reached as there has been several Call for Sites exercises undertaken with the intention of identifying additional land within the existing urban area as part of the emerging Joint Local Plan and as part of historic plan-making. Therefore it is considered that any potential for the urban area to accommodate additional growth is likely to be as a result of either; increasing the density at which the land is developed, identifying more open space to be considered for residential or employment development purposes or additional land becoming available as a result of ongoing review of operational assets.

5.2 As discussed previously in this paper the densities employed to calculate the potential capacity of the urban area were informed as part of the Joint SHLAA Methodology² which was subject to a targeted stakeholder consultation during winter 2015. The Joint SHLAA methodology provided specific local densities across the plan area having considered the historic density at which developments had been completed, along with consideration of local character. Considering the process which has been followed to identify these densities it is not envisaged that this option can be relied upon to deliver the increased capacity required to accommodate development needs within the urban area.

5.3 The Newcastle-under-Lyme Open Space Strategy⁵ has assessed the Borough's open space network and attributed a provision standard in relation to each open space typology i.e. a number of hectares per 1000 population for parks, natural/semi-natural open space and provision for young children. The Green Infrastructure Strategy⁶ is also an important consideration with regards to the identification of open space with the potential to be used for

⁵ Open Space Strategy (2017) - <https://moderngov.newcastle-staffs.gov.uk/documents/s22542/Newcastle%20under%20Lyme%20Open%20Space%20Strategy%20Final.pdf>

⁶ Green Infrastructure Strategy(2017) - <https://moderngov.newcastle-staffs.gov.uk/documents/s22539/Newcastle%20under%20Lyme%20Green%20Infrastructure%20Strategy%20Final.pdf>

accommodating development needs. Having taken into account both strategies and that the Open Space Strategy provides an indication of provision requirements against Newcastle's population, it is considered that open space with the potential to be described as 'surplus' to requirements⁷ has been identified and the vast majority of any potential capacity from this option has been included within the land supply.

5.4 The available land supply has also been developed in consultation with the asset management and estates teams of both the Borough and County Council. This has ensured that all land currently available has been taken into consideration when calculating the potential capacity within urban area, and beyond. The council will continue to review the availability of sites as operational assets are reviewed.

Open Countryside beyond the Green Belt

5.5 Approximately 39% (8,229 hectares) of Newcastle-under-Lyme's area is open countryside beyond the Green Belt boundary. Paragraph 79 of the NPPF states "*The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open...*" Therefore, although open countryside beyond the Green Belt boundary is not subject to a particular designation itself, development within it is likely to be counter to the fundamental aim of the Green Belt.

5.6 Also channelling growth towards these locations would represent a more dispersed pattern of development compared with alternative options available which have the potential to accommodate growth in more accessible locations i.e. closer to employment opportunities and the infrastructure of the major urban area. The problems which can result from channelling development to sites beyond the Green Belt are illustrated by the case study of the City of Cambridge.⁸ In the year 2000 the pre-1996 policies to manage growth in Cambridge (directing housing growth to locations beyond the Green Belt) had contributed to 40,000 daily commutes across the Green Belt separating the city from the open countryside, with workers outside of the City increasingly outnumbering resident workers⁹.

5.7 This area of the Borough contains a number of natural and historic environment assets, such as; best and most versatile agricultural land, minerals, open space, protected habitats and species, listed buildings / registered parks and gardens, and valuable landscapes. Land in this area will also provide a number of eco-system services such as carbon sequestration, and water regulation. Therefore it is likely that by directing development need within this these assets and the eco-system functions they provide could be adversely affected.

5.8 Therefore this option, compared to others, is considered less likely to perform as well with regards to achieving sustainable development e.g. protecting the natural environment, historic landscapes and reducing the need to travel and supporting / growing the roles of strategic centres. Furthermore it would erode the purpose of having a Green Belt which

⁷ NPPF paragraph 74

⁸ Cambridge Local Plan 2006 -

<https://www.cambridge.gov.uk/sites/default/files/docs/Local%20Plan%202006.pdf>

⁹ Page 10 Local Government Association: Backing For a big idea – Consensus building for strategic planning in Cambridge (2013) - <https://www.local.gov.uk/sites/default/files/documents/backing-big-ideaconsensus-ddf.pdf>

includes preventing encroachment into the countryside. It should also be noted that this option could make some contribution towards housing need as the Preferred Option proposes 6 preferred sites for housing¹⁰ with capacity for 437 dwellings within this area, 4 out of the 6 sites have planning approval (total capacity for 331 dwellings).

5.9 While the option to accommodate additional need within this area exists, in light of the reasoning set out above, it is not considered to represent a realistic or sustainable spatial distribution option, particularly for significant levels of growth. Consequently this option is unlikely to be consistent with the requirements of the NPPF. That said, the potential for the area to make a further limited contribution towards the Borough's development need will continue to be investigated and appraised as further evidence becomes available.

Green Belt

5.10 Approximately 45% (9,495 hectares) of Newcastle-under-Lyme's area is designated as Green Belt. Paragraph 83 of the NPPF states "*Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.*" However neither National policy (NPPF) nor guidance (PPG) defines 'exceptional circumstances' and therefore it is for the Local Authority to decide whether a case for such circumstances can be made. It is then ultimately for the Inspector presiding at the examination of the Joint Local Plan to decide if the circumstances presented can be regarded as exceptional.

5.11 The requirement for exceptional circumstances to exist to justify the release of land from the Green Belt is testament to the importance that is attributed to aims of Green Belt policy and the five purposes Green Belt serves¹¹.

5.12 The Housing White Paper 'Fixing our Broken Housing Market' (February 2017) proposes to introduce a requirement to the test for exceptional circumstances which requires all other reasonable options to have been considered prior to Green Belt boundaries being amended.

The White Paper states:

"we propose to amend and add to national policy to make clear that...authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
- optimising the proposed density of development; and*

¹⁰ Newcastle-under-Lyme Housing Site Reference: LW12, LW13, LW17, LW31, LW33, and LW34

¹¹ NPPF paragraph 80

- exploring whether other authorities can help to meet some of the identified development requirement.”

5.13 It is important to note that the Housing White Paper is a consultation document and therefore its weight reflects this status. Some or all of these proposals may feature in the revised NPPF due for release Easter 2018, or result in amendments to national planning practice guidance. However, while the options referred to in the White Paper are yet to be explored in full, this section of the paper describes the alternatives that have been reviewed to date.

5.14 The Borough’s Green Belt surrounds the major urban areas of Kidsgrove, Newcastle and the significant rural village centres that are in closest proximity to the major urban area. As a result there is the potential for land within particular sections of the Green Belt to have good accessibility to existing physical and social infrastructure (strategic transport network, public transport, schools, health centres, and utilities), albeit generally to a lesser degree compared with the urban area. In contrast there are locations within the Green Belt and beyond that do not benefit in this way, particularly in rural areas which do not adjoin the existing urban area (unconnected to significant rural village centres).

5.15 Within the Green Belt there are also a number of existing employment sites which are important to the local and sub-regional economy in terms of the provision of jobs for residents and those who commute from other areas. Supporting the businesses that occupy these employment sites is necessary to realise the vision and aims of the Joint Local Plan. Furthermore, their position within the Green Belt has the potential to provide locations to direct housing growth towards. Such locations might provide sustainability benefits associated with the provision of housing in close proximity to employment opportunities (i.e. from the reduced need to travel and the availability of existing physical infrastructure).

5.16 The Green Belt contains a number of natural and historic environment assets, such as; best and most versatile agricultural land, minerals, open space, protected habitats and species, listed buildings / registered parks and gardens, and valuable landscapes. Land designated as Green Belt will also provide a number of eco-system services such as carbon sequestration, and water regulation. Therefore it is likely that by directing development need within the Green Belt these assets and the eco-system functions they provide could be adversely affected.

5.17 Furthermore there is the impact to the Green Belt itself, and the fundamental aim of Green Belt policy to consider as described in paragraph 79 of the NPPF “...to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” Directing growth of any scale towards designated Green Belt will impact negatively upon openness and the purposes it serves, particularly as the Green Belt Assessment undertaken by consultants ARUP¹² did not identify any land within the Green Belt which makes no overall contribution to the purposes of including land within it.

¹² Green Belt Assessment ARUP (2017) - https://www.newcastle-staffs.gov.uk/sites/default/files/IMCE/Planning/Planning_Policy/Newc_Stoke_GBA_Final_Report_21_11_17.pdf

5.18 The extent to which the option could provide additional capacity to accommodate development need locally is dependent on the location and availability of otherwise appropriate sites for development, for which their release from the Green Belt would result in limited harm which can either be contained or mitigated against. Such sites would also have to be assessed to determine whether, on balance, their release supports the achievement of sustainable development.

5.19 Development within the Green Belt that is of significant scale is thought more likely to be able to support the provision of additional infrastructure and facilities compared with numerous smaller scale developments. Furthermore, if locations exist to form strategic urban extensions within the Green Belt, potentially containing harm to a limited number of locations or at one location, could result in an overall lesser degree of harm compared with a more dispersed approach of a greater number of non-strategic smaller scale developments throughout the Green Belt, which have the potential to undermine the integrity of the Green Belt.

Conclusion

5.20 This section of the report explores options available to increase land supply within Newcastle-under-Lyme. While the urban area of Newcastle-under-Lyme remains the focus to accommodate the majority of the Borough's development needs, via continued urban regeneration and potential surplus open space, the options to increase land supply here are not considered to be realistic and are unable to provide the additional capacity that is required.

5.21 The open countryside beyond the Green Belt forms a significant proportion of the Borough's area. While this land is not designated as Green Belt the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. This infers that land beyond the Green Belt boundary is also to be protected from urban sprawl by the presence of Green Belt. Therefore the appropriateness of leap-frogging the Green Belt is questionable as this appears contrary to achieving the Green Belt's aim. This option compared with others is also considered less preferable as it would result in a more dispersed development pattern compared with alternatives, resulting in harms commonly associated with this. This area also contains natural and historic environmental assets, including important landscapes.

5.22 It is clear that there are a number of negative effects and also positives associated with accommodating additional growth within the Green Belt. Therefore the appropriateness of the option is considered to be dependent on the availability of sites which are not significantly affected by development constraints and are able to support the aims and objectives of the Joint Local Plan. Furthermore, if there are locations with particular characteristics (i.e. sites or connected sites amounting to large-scale development in locations which do not overall contribute strongly to the purposes of the Green Belt) there is potential to limit and mitigate harm to the Green Belt and perhaps greater potential to protect the Green Belt's overall integrity. The Green Belt also contains natural and historic environmental assets, including important landscapes which should be taken into consideration.

5.23 Having considered the alternatives presented and the findings of the sustainability appraisal (see appendix 3), due to the potential benefits that exists in the Green Belt with regards to the provision of housing and employment in close proximity, access to existing physical and social infrastructure, and the potential to limit / mitigate harm to the Green Belt it is considered to represent the most sustainable and appropriate location to accommodate additional growth.

6. Exceptional Circumstances

6.1 This paper, along with the (individual) housing and employment technical papers, have described the reasoning behind the selection of the preferred growth option C (Supporting Economic Growth). Having done so, they also describe the selection of the preferred broad location option 6¹³ as the most appropriate of the options available to accommodate the Borough's and Joint Local Plan area's¹⁴ housing and economic development needs.

6.2 Further justification for selecting option 6 is provided in section 4 of this paper which reviewed the evidence relating to the specific needs of Newcastle-under-Lyme and material planning considerations that are considered to support efforts being made to accommodate development needs within Newcastle-under-Lyme in advance of exporting need either within the plan area, or beyond. In addition, section 5 of the paper assessed potential alternatives to increase capacity within the urban area (increasing density of future development and releasing additional open space) and concluded that these options would not avoid the need to find additional land beyond the existing urban area of Newcastle-under-Lyme.

6.3 Option 6 of the Strategic Options consultation did not specify where major urban extensions should be located (Green Belt or open countryside beyond the Green Belt). As a result section 5 of this paper reviewed both areas under broad location Option 6 with regards to their appropriateness to provide major urban extensions. It concluded that the open countryside beyond the Green Belt was not a realistic or the most sustainable broad location option to accommodate significant levels of growth compared with the alternatives available.

6.4 As a result of the paper having assessed alternatives, sustainability implications, and material planning considerations there is considered to be a strong case for amending Newcastle-under-Lyme's Green Belt boundary in order to provide additional land to meet development need. This view is reached having taken into account the Borough's 44% shortfall against its total housing need (586 dwellings per annum), housing affordability issues (demand exceeding supply), an affordable housing need which equates to 41% of the Borough's total housing need for a five year period, and 34% thereafter, and an identified economic development need for a range of B class employment land (see 4.10 to 4.13 and the Employment Technical Paper). Furthermore, the SHMA Review also indicates that without intervention (increased housing supply in line with supporting economic growth) the demographic structure of the plan area will increasingly consist of residents who are aged 65+ which is likely to have implications for the mid to long term sustainability of the Borough and plan area.

6.5 The exceptional circumstances case is also very much supported by improving the long term sustainability of the plan area by capitalising on the unique opportunity presented by Keele University's role as a key economic driver. The scale and importance of the institution

¹³ (Combined (Option 4) + Major Urban & Rural Extensions in the Countryside and Green Belt (Preferred Option)

¹⁴ Economic needs only of the entire plan area

is recognised by local partners and local economic development strategies including the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) Strategic Economic Plan. A study of the University's economic contribution by Regeneris Consulting estimated that in 2014/15 the University supported around 3,400 Full Time Equivalent jobs within Newcastle-under-Lyme and Stoke-on-Trent. These jobs are generated through its: teaching; consultancy; support for new enterprise; world leading research and innovation activities; and by working closely with businesses on the neighbouring Science and Innovation Park, including medical technology and healthcare sectors. As a result the University makes a major contribution to the educational, economic and social well-being of the area, which will be strengthened further through a £70 million investment plan, known as the New Keele Deal, generating 700 high value jobs (in the above sectors) in and around the University. To help realise the benefits of this growth and investment Keele University is an integral part of the Joint Local Plan's growth strategy which includes a vision to be a hub for innovation and investment.¹⁵ The presence of Keele University is therefore an important part of the justification for exceptional circumstances.

6.7 The research and development and academic activities of the University together with the adjacent Science and Innovation Park form a technological cluster, which together work to drive higher level skills across the area. At present there are an estimated 780 people working within the Innovation Centres located on the Science and Innovation Park, in high value sectors such as medical technologies, green energy, ICT and advanced materials. The University plays a key role in this employment by supplying highly skilled graduates.

6.6 The expansion of the existing Science and Innovation Park on the doorstep of Keele University would greatly enhance the technological cluster, boosting opportunities to access a range of new highly skilled and well paid jobs in the innovation and medical technology sectors, many of which will be available to the Universities graduates. In this way embryonic business creation¹⁶ would also be fostered, which is important in providing jobs for young people, attracting graduates and supporting their retention.¹⁷

6.7 Releasing land within the Green Belt at Keele for employment purposes is, therefore, essential if we are to succeed in addressing the imbalance in the B class employment sectors, transforming the low-skill nature of the sub-regional economy and attracting investment in highly skilled jobs which are critical to making a positive step change in the local economy.

6.8 Siting new housing in the vicinity of the University, with its highly-attractive, landscaped campus, and on the shoulder of an extended Science and Innovation Park is also vital to achieving a step change in the economy, in which the housing market plays an important part.

6.9 Critically new housing in this location has the potential help to provide a range of high quality housing, which has the potential to directly appeal to academic staff¹⁸ and the research and development labour force. The formation of a housing and science and innovation cluster would also be advantageous to businesses within the research and development sector, who are generally workforce hungry compared to those in the industrial and logistical sectors. These dual benefits would help to attract and retain a workforce capable of maintaining the University's status as a centre of excellence, as well as, enhancing the Science and Innovation Park's appeal as a location for business within the

¹⁵ Joint Local Plan Preferred Options Consultation Document (paragraph 2.73, Appendix 4 –Revised Vision, Aims and Objectives)

¹⁶ Joint Local Plan Preferred Options Consultation Document (paragraph 4.4)

¹⁷ Joint Local Plan Preferred Options Consultation Document (paragraph 2.53)

¹⁸ Joint Local Plan Preferred Options Consultation Document (paragraph 2.72)

sub region. In addition the housing would make a valuable contribution to meeting Newcastle-under-Lyme's shortfall in market and affordable housing,

6.10 Central to the case for the targeted release of Green Belt land to the west of Newcastle Town Centre and in the vicinity of Keele University is the fact that it would not be possible to reproduce this form of development anywhere else in North Staffordshire, since nowhere else has the co-location and critical mass of university facilities, the concentration of knowledge-based industries and the potential for a residential environment of the highest standard. Furthermore support for the University's growth, as well as, the expansion of the Science Park is necessary to sustain Keele University's nationally important position, given the highly competitive environment in which the University must compete for key staff, students, businesses and research commissions.

6.11 While there will inevitably be harm to the Green Belt and additional harm e.g. to the environment as a result of directing growth to locations within the Green Belt the effects of doing so will form an important consideration as the Joint Local Plan progresses including the drafting of policies that will seek to mitigate harm and where possible provide improvements. Furthermore the anticipated negative effects should also be considered alongside the social and economic benefits that could be achieved i.e. contribution made towards the provision of affordable housing, improving the prospect of young residents forming households in the Borough and the provision of high value jobs by ensuring that the plan area provides for both the quantum and qualitative employment development needs.

Conclusion

6.12 While not an exhaustive list, the principal factors that are considered capable of amounting to "exceptional circumstances" and would therefore justify amendment to the Green Belt boundary are:

- Newcastle-under-Lyme's Housing Need.
- Newcastle-under-Lyme's House Prices & Affordability Issues.
- Newcastle-under-Lyme's Affordable Housing Need.
- Establishing a demographic balance to support identified employment growth.
- Providing higher value jobs within the Plan area and taking advantage of the socio-economic benefits of the success of Keele, whilst seeking to retain and attract graduates and encouraging greater embryonic business creation.

7. Site Selection Housing and Employment

7.1 This section of the paper presents the assessment criteria which have been employed to inform an initial site selection process for preferred housing and employment sites. These sites are listed in the appendices to the Preferred Options consultation document and the appendices of the Housing and Employment Technical Papers. The criteria informing the site selection process at this stage have been chosen on the basis that the emerging development strategy of the Joint Local Plan will continue to channel the majority of growth within, or, if this is not possible, to sustainable locations in close proximity to the Strategic Centres¹⁹ and Significant Urban Centres²⁰, with facilities, services and transport

¹⁹ City of Stoke-on-Trent and Newcastle Town Centre

²⁰ Longton, Tunstall, Stoke, Burslem, Fenton, Meir, Kidsgrove, Wolstanton, Chesterton and Silverdale

infrastructure that are available to support existing and future residents (with further infrastructure investment).

Housing Assessment Criteria

1. Developable site (in full or part) or site (in full or part) that is constrained by policy constraints which can be removed or mitigated.
2. The Green Belt parcel assessment²¹ affecting the site indicates its overall contribution to the purposes of the Green Belt is no greater than moderate. This is to ensure that the development of a site does not lead to an unacceptable harm to the Green Belt function.
3. Were the site to be released from the Green Belt durable boundary features are available to prevent encroachment/sprawl.
4. Connected to Major Urban Area (Newcastle / Kidsgrove).
5. Is within 2km of the strategic road network (A34, A500, A50 and M6).
6. Within 500 metres of existing or proposed employment opportunities.

Identification of a Strategic Development Opportunity

7.2 A high-level assessment of alternatives for a large-scale (approximately 100+ dwellings) opportunity has been undertaken and is provided as Appendix 3 to the Housing Technical Paper. The purpose of this assessment is to allow a comparison of alternatives capable of forming strategic scale development opportunities. Given the urban area has capacity for 85% (23,503 dwellings - including a 5% buffer to Stoke's housing need) of the plan area's housing need it is considered that, if possible, there are likely to be advantages, particularly in terms of the provision of the necessary infrastructure to make development acceptable in planning terms, with providing a significant amount of the remaining housing shortfall (5,109 not accounting for Stoke's 5% buffer) largely at a single location.

7.3 The high-level assessment demonstrated that all options had their own merits, particularly in respect of those able to contribute towards addressing Newcastle's housing shortfall within the Borough. However the assessment indicates that a cluster of interconnected sites positioned between Newcastle's urban area and Keele village, on-balance, have the potential to provide for a greater number of the aims and objectives of the Joint Local Plan compared alongside alternatives.

7.4 These sites collectively have the potential to form a single strategic development opportunity providing in excess of 2,400 dwellings in close proximity to existing and

²¹ Green Belt Assessment 2017 - https://www.newcastle-staffs.gov.uk/sites/default/files/IMCE/Planning/Planning_Policy/Newc_Stoke_GBA_Final_Report_21_11_17.pdf

proposed employment land. It is considered that an opportunity for development of this scale, particularly in close proximity to the existing major urban area, has the potential to deliver the required infrastructure and will also benefit from utilising any remaining capacity which might exist.

Employment Assessment Criteria

7.5 The Preferred Options consultation document and the Employment Technical Paper explain that whilst a quantitative assessment identifies a sufficient amount of land to meet the need for 199 hectares of employment land across the Plan area; a qualitative assessment identifies a shortfall in the amount of land (from the sites identified) that is suitable and in an appropriate location, to deliver research and development B-class employment land uses.

7.6 A high level assessment of sites has therefore been undertaken using the following criteria:

1. Developable site (in full or part) or site (in full or part) that is constrained by policy constraints which can be removed or mitigated.
2. The Green Belt parcel assessment²² affecting the site indicates its overall contribution to the purposes of the Green Belt is no greater than moderate. This is to ensure that the development of a site does not lead to an unacceptable harm to the Green Belt function.
3. Were the site to be released from the Green Belt durable boundary features are available to prevent encroachment/sprawl.
4. Connected to an existing employment or academic centre.
5. Is within 2km of the strategic road network (A34, A500, A50 and M6)
6. Within 500 metres of existing or proposed housing opportunities.

7.8 The criteria informing the site selection process at this stage have been chosen on the basis that the emerging development strategy of the Joint Local Plan will continue to channel the majority of growth within, or, if this is not possible, to sustainable locations in close proximity to the Strategic Centres and Significant Urban Centres, with facilities, services and transport infrastructure that are available to support existing and future business.

7.9 This high level assessment has identified only one site for that type of employment land use that can meet the vision, aims and objectives of the Joint Local Plan. The site identified is close to Keele University and its Science and Innovation Park. It is considered that an employment site for research and development employment use in the vicinity of Keele University and the existing Science and Innovation Park would redress the balance across

²² Green Belt Assessment 2017 - https://www.newcastle-staffs.gov.uk/sites/default/files/IMCE/Planning/Planning_Policy/Newc_Stoke_GBA_Final_Report_21_11_17.pdf

the range of B-class sectors and contribute to achieving the appropriate mix of B-class uses; strengthen employment in knowledge-based sectors; would provide high value employment in a location that benefit from an established academic, and research and development cluster; and contribute to achieving a positive step change in the local economy. Aligned with housing it would contribute further to a pattern of sustainable development.

7.10 The employment sites which have been considered and do not feature in the preferred sites identified in presented in appendix 2 of the Employment Technical Paper.

8. Next Steps

8.1 Further work will be undertaken to refine the site selection process which remains an iterative process and to assist with developing the exceptional circumstances case. The Draft Plan stage will be informed by consultation responses received at the Preferred Option stage and further evidence with which to assess alternatives to accommodate housing need and potentially identify additional land to meet development needs. This will provide a methodology to comprehensively test sites against, along with those which might come forward as part of the Call for Sites exercise which runs parallel to the Preferred Option consultation.

Appendix 1: Housing Technical Paper Table 1 - Existing Supply against the SHMA within the existing built up area only

		Stoke	Newcastle	Plan Area
Requirement 2013 - 2033		16080	11720	27800
Completion 2013 - 2017		2235	1080	3315
Preferred Sites (Total)		10301	4357	14658
<i>Of which:</i>	<i>Urban centres</i>	8076	3568	13869
	<i>Wider urban area</i>	2225		
	<i>Rural area</i>		789	789
Remaining capacity on sites with planning permission (outside of the SHLAA)		1164	289	1453
Windfall allowance		3192	885	4077
Total delivery against the requirement		16892	6611	23503
Shortfall/Surplus		812	-5109	-4297
Total Delivery as Percentage of requirement		105	56	85

Appendix 2: Housing Technical Paper Table 4 – Supply against the SHMA with proposed Green Belt release

		Stoke	Newcastle	Plan Area
Requirement 2013 - 2033		16080	11720	27800
Completion 2013 - 2017		2235	1080	3315
Preferred Sites (Total)		10301	7367	17668
<i>Of which:</i>	<i>Urban centres</i>	8076	3568	13869
	<i>Wider urban area</i>	2225		
	<i>Rural area</i>	-	789	789
	<i>Sustainable urban extension</i>	-	2454	2454
	<i>Other Green Belt sites</i>	-	556	556
Remaining capacity on sites with planning permission (outside of the SHLAA)		1164	289	1453
Windfall allowance		3192	885	4077
Total delivery against the requirement		16892	9621	26513
Shortfall/Surplus		812	-2099	-1287
Percentage of requirement		105	82	95

Appendix 3: Summary Findings of the Sustainability Appraisal for the Preferred Options

Preferred Option	Description	Summary of Sustainability Appraisal:
<p>Preferred Growth Option</p>	<p>The Preferred Options Consultation document sets out the following preferred option for growth: <i>“The preferred option for growth is to deliver the Objectively Assessed Need of a minimum of 199 hectares of employment land and 27,800 new homes between 2013 and 2033 (1,390 new homes per year) as a minimum across the plan area, with some potential uplift to help to deliver wider economic aspirations, flexibility and choice where they can be demonstrated to be deliverable during the plan period”</i></p>	<p>As this is a high level preferred option, determining the impact on the sustainability objectives is largely dependent on further information about how development will be accommodated, i.e. the location, type and form of development. This Preferred Growth Option does however have major positive effects identified against the objectives to provide housing choice and help meet the housing needs of the whole community and to provide a range of employment land and premises. Most of the comments and mitigation measures identified against the objectives relate to having appropriate planning policies and the selection of sites that will manage development and eliminate or minimise any potential impacts on energy use, air quality, biodiversity and the natural environment, site remediation, flood risk, the historic environment, green space, waste generation and treatment, city and town centres and wider infrastructure such as transport networks, water infrastructure and community services and facilities. These will all need to be addressed as the preferred level of growth is taken forward in the Draft and Final versions of the Joint Local Plan.</p>
<p>Preferred Spatial Option</p>	<p>The Preferred Options Consultation document proposes to divide the plan area in to five distinct strategic areas to reflect the wide range of challenges and opportunities that are present in these distinct locations:</p> <ul style="list-style-type: none"> 6 Stoke-on-Trent City Centre and Railway Station 7 Stoke-on-Trent Urban Area 8 Newcastle-under-Lyme and Kidsgrove Urban Area 9 Newcastle-under-Lyme Western Urban Extensions 10 Newcastle Rural Area 	<p>All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying five different strategic sub-areas within the Joint Local Plan, rather than providing detailed information about how policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.</p>
<p>Preferred Employment Land Supply</p>	<p>230 hectares of employment land has been identified within the plan area that can be delivered between 2013 and 2033. The preferred option is therefore to deliver 15% above the objectively assessed need for 199 hectares of employment land over the plan period 2013-2033 to reflect this</p>	<p>Most of the potential effects are dependent on implementation as the impacts of the preferred employment land supply will depend on the scale and types of uses that will be accommodated on each site and how the development of these sites will be managed through planning policy. There were potential positive effects identified against objectives to regenerate degraded environments, increasing</p>

Preferred Option	Description	Summary of Sustainability Appraisal:
	land supply and to provide choice and flexibility to the market.	life expectancy and the health and mental well-being and the provision of a range of community facilities. A major positive effect was identified against the objective to provide a range of employment land and premises. The employment land supply should be balanced with housing growth which also has economic benefits (through construction and the operation of the housing market). There may be potential pressures on the transport network arising from this land supply and this should be mitigated through transport infrastructure improvements, particularly at major interchanges and hubs.
Quality of Employment Land	This preferred option seeks to deliver the recommendations of the Employment Land Review (2015) by aiming to deliver 75% of the preferred employment land supply for industry and warehousing (B1c, B2 and B8 uses) and 25% for offices and research and development (B1a and B1b uses).	As with the overall employment land supply, the potential effects of this preferred option were identified as dependent on implementation. There were more neutral effects identified for this preferred option, particularly against objectives that were location specific, for example the objectives related to enhancing centres, regenerating degraded environments and reducing development within locations at risk of flooding. This reflects that this preferred option relates to the type of employment land and premises proposed, rather than their location which was covered in the previous preferred option. Potential positive effects were identified for objectives related to improved health and mental well-being and the provision of a more equitable society. There was a major potential positive effect identified for providing a range of employment land and premises. There were no significant potential negative effects identified against any of the objectives for this preferred option. Mitigation measures identified to improve the sustainability of this preferred option included aiming to provide jobs suitable for lower income and skilled groups, as well as higher paid and skilled jobs and the increased focus on Research & Development.
Rural Employment	The preferred option is to prepare a criteria-based policy which takes a positive approach towards rural enterprise but does not allocate land for employment development in the rural area. This would continue the approach towards rural employment set out in the Core Spatial Strategy.	Most of the potential effects identified are dependent on implementation as the potential effect will be determined by the content of the proposed planning policy. In particular, this will need to have regard to conserving, enhancing and promoting interest in the local distinctiveness and the historic environment, strengthening the quality of the landscape, ensuring the provision of associated shopping and commercial services and protecting and enhancing the vitality and viability of village centres. The potential effect against the objective to provide a range of employment land and premises was also dependent on

Preferred Option	Description	Summary of Sustainability Appraisal:
		implementation rather than being a potentially positive effect, as the preferred option is to develop a criteria based policy to promote development proposals rather than to identify specific sites and premises. A potential positive effect identified against this objective is again dependent on the content of that criteria based policy.
Preferred Spatial Distribution of Housing	<p>This preferred option sets out the identified housing land supply across the plan area which can support the delivery of the Preferred Growth Option. It identifies that the overall land supply is made up from the following sources:</p> <ul style="list-style-type: none"> • 50% within the urban areas of Stoke-on-Trent, Newcastle-under-Lyme and Kidsgrove • 14% from expected windfall sites • 12% has already been completed between 2013 and 2017 • 9% from sustainable urban extensions • 5% from sites with planning permission • 3% from the rural area of Newcastle-under-Lyme • 2% from within the Green Belt. <p>There is a shortfall of 5% of the preferred level of growth, equating to 1,400 dwellings, which could be met by identifying further capacity from any of the above sources.</p>	<p>Most of the potential effects that were identified against the objectives were dependent on implementation. There was a major positive potential effect identified against the objective to provide housing choice and help to meet the housing needs of the whole community. Recommended mitigation measures to improve the sustainability of the preferred option focus on the content of planning policies to manage the development of this preferred housing land. This should include planning policies to ensure enhancements to green space, biodiversity, flood risk and drainage, the historic environment, and supporting social and transport infrastructure are enabled through development and that these are not detrimentally impacted on.</p>
Stoke-on-Trent City Centre	<p>This preferred option seeks to support the delivery of the refreshed Development and Strategic Plan for the City Centre (September 2017). This will continue to build on the progress already made within the City Centre and support further improvements, including:</p> <ul style="list-style-type: none"> • Further public realm improvements • Unity Walks and Smithfield developments • Improvements to Hanley Indoor Market, Station Gateway and Hanley Park • Further investment in the 	<p>Most of the potential effects for this preferred option are dependent on implementation but there are a number of positive potential effects, especially against the social and economic objectives relating to providing housing choice, reducing the need to travel, providing community, leisure, shopping and commercial services, and providing a range of employment land and premises. A major positive potential effect was identified against the objective to protect and enhance the vitality and viability of centres, as this preferred option is focused on enhancing the City Centre. Recommended mitigation measures to improve the sustainability of this preferred option focus on ensuring that the content of appropriate planning policies will manage development in</p>

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	<p>Cultural Quarter</p> <ul style="list-style-type: none"> • Eight residential opportunity sites • District Heat Network 	<p>and around the City Centre to ensure that the design and form of development schemes are appropriate and that wider benefits are brought about to green space, heritage, transport, accessibility, the draw of the City Centre for visitors and ensuring that benefits are shared with deprived communities in and around the City Centre. In particular the links between the City Centre and nearby focal locations should be enhanced, for example Hanley Park, Central Forest Park, Stoke-on-Trent Railway Station, Etruria Valley and Festival Park.</p>
<p>Stoke-on-Trent Railway Station</p>	<p>This preferred option would support the delivery of the Stoke-on-Trent Station Masterplan (framework strategy) by improving linkages between the railway station and the city centre, improve capacity at the station by enabling more effective movement of people to and from the station buildings, and provide mixed use development around the station which would include some limited main town centre uses.</p>	<p>This preferred option achieved potentially positive effects against most of the social and economic objectives. In particular there were major positive potential effects identified against the objectives to reduce the need to travel, increase transport choice and accessibility and to increase the use of public transport. The potential effects against these objectives are a direct result of the proposal to develop the area around Stoke-on-Trent Railway station, which should increase the range of uses in the area and increase the activity and use of this major transport hub. Recommended measures to maximise these positive effects were to ensure that the station and associated transport infrastructure are able to accommodate the increased demand generated from intensified use and activity in the area and to ensure that any main town centre uses that are developed in this location are not to the detriment of Stoke Town Centre. There was more uncertainty against environmental objectives, with many potential effects depending on how development is implemented, in particular with regard to the objectives to adapt to a changing climate, improve air quality, reduce the amount of development at risk of flooding and enhancing the quality and accessibility of green space. There were potential positive effects identified against the objectives to conserve and enhance the historic environment and assets due to the presence of listed buildings and conservation areas, these potential effects could be identified as a major positive if the reuse of historic buildings and assets and developments within their setting are undertaken in a sympathetic way.</p>
<p>Newcastle Western Urban Extensions</p>	<p>The preferred option targets the release of land within the Green Belt in locations adjacent to the major urban area of Newcastle Town. The aim of doing so is to increase land supply to assist with</p>	<p>Most of the potential effects identified against the objectives are dependent on implementation. There were positive potential effects identified against the objectives to provide housing choice and a range of employment land and premises. There was</p>

Preferred Option	Description	Summary of Sustainability Appraisal:
	<p>accommodating the Preferred Growth Option and to contribute towards realising the vision and objectives of the Joint Local Plan.</p>	<p>also a minor negative potential effect identified against the objective to ensure that there is an overall net gain in the extent and quality of biodiversity. This is because of the loss of existing natural features in the area and close proximity of Ancient Woodland. The recommended mitigation measures to improve the sustainability of the preferred option include ensuring that relevant planning policies and the allocation of land for development in this location address potential impacts and seek to achieve an overall improvement to biodiversity, as well as bringing about improvements to landscape, open space, community services and facilities and transport infrastructure.</p>
<p>Berryhill</p>	<p>As the largest preferred site its delivery would help to provide a wide range of housing sites across the plan area. The importance of the site's ecology, heritage and landscape character is recognised and the preferred option proposes to manage the delivery of development in a sensitive way which would see pockets of residential development in "garden neighbourhoods". This would be supported by improvements to green infrastructure and transport infrastructure, in particular the delivery of the Hanley-Bentilee Link Road.</p>	<p>Most of the potential effects identified against the objectives are dependent on implementation. There are also a small number of objectives where both positive and negative potential effects were identified. The negative potential effects were identified against the objectives to ensure an overall net gain in the extent and quality of biodiversity, the quality of the landscape and city townscape, local distinctiveness and to maintain and enhance the quality and accessibility of green space. These negative potential effects were identified due to the recognition within the preferred option that Berryhill has existing landscape, ecological and green space value. There are however enhancements that can be to these objectives through appropriate planning policies, designations and allocations to ensure that development within Berry Hill is implemented in a sensitive way. A major positive potential effect was identified against the objective to provide housing choice and help to meet the housing needs of the whole community.</p>
<p>Green Belt</p>	<p>The preferred option includes targeted releases of land within the Green Belt adjacent to the major urban areas of Newcastle Town and Kildersleepe Town. The aim of doing so is to increase land supply to assist with accommodating the local authority's development need and to contribute towards realising the vision and objectives of the Joint Local Plan.</p>	<p>Most of the potential effects identified against the objectives are dependent on implementation and depend on which areas are released from the Green Belt and how their future use is managed. There are potential positive effects identified against the objectives to provide housing choice and a range of employment land and premises, as these are given as the main drivers of release from the Green Belt under the preferred option. There was one minor negative potential effect identified against the objective to strengthen the quality of the landscape and townscape, which reflects that the release of land from the Green Belt is likely to have a subsequent effect on openness. Mitigation measures to address this will be to ensure that any future</p>

Preferred Option	Description	Summary of Sustainability Appraisal:
		development on land that is released makes an overall enhancement to landscape and townscape.
Preferred Hierarchy of Centres	A new hierarchy of centres is proposed to replace that currently defined in the Core Spatial Strategy. It proposes four tiers, with the strategic centres of Stoke-on-Trent City Centre and Newcastle Town Centre as Tier 1, followed by urban town centres at Tier 2, district and local centres at Tier 3 and rural or neighbourhood centres at Tier 4. The purpose of the new hierarchy is to reflect the needs of the community that each centres serves, with larger centres fulfilling a regional and sub-regional role whereas smaller centres provide a more localised role.	This preferred option has a range of potentially positive effects. Most of these are minor potential positive effects identified against the objectives to conserve promote and enhance local distinctiveness, the historic environment and assets, strengthening the quality of landscape and townscape, regenerating degraded environments, the provision of community and leisure services, improving health and mental wellbeing, reducing the need to travel and increasing the use of public transport. There was a major potential positive effect identified against the objective to protect and enhance the vitality and viability of centres as this is the most relevant objective to this preferred option. Mitigation measures to improve the sustainability of this preferred option are mainly focused on ensuring that there are a range of services and facilities available in each centre that are appropriate to the size of that centre and its place in the hierarchy, and that these services and facilities are accessible to both existing and new residents and communities across the plan area.
Centre Boundaries	The town and city boundaries currently identified in Stoke-on-Trent in the saved policies from the City Plan 2001 and the Core Spatial Strategy Proposals Map have been reviewed. This has led to some changes being proposed to the boundaries of Stoke-on-Trent City Centre, Longton Town Centre, Stoke Town Centre and Tunstall Town Centre. These changes are proposed to cover recent developments of main town centre uses or identified opportunities for future development of these uses. In Newcastle, no changes are currently proposed to existing boundaries but it is proposed to fix Newcastle Town Centre's boundary to follow the ring road.	Most of the potential effects are dependent on how this preferred option will be implemented, but there are also some notable positive effects. In particular there is a major potential positive effect identified against the objective to protect and enhance the vitality and viability of centres but there are also minor potential positive effects identified against the objectives to strengthen the quality of landscape and townscape, regenerate degraded environments and the provision of community, leisure, shopping and commercial services. Recommended mitigation measures to improve the sustainability of this preferred option largely depend on the content and focus of proposed policies to manage the types of uses to be accommodated within the boundaries and ensuring that there are no detrimental impacts on the historic and cultural environment and assets or on the distinctive landscape and townscape of the centres and their surrounding areas.
Key Strategic Sites for Retail and Leisure	Ten development schemes are identified in the Tier 1 and 2 centres, where major retail and leisure uses will support their future prosperity, vitality and viability.	Most of the potential effects are dependent on how this preferred option will be implemented, however there are some potentially positive effects identified against the objectives for the provision of community, leisure, shopping and

Preferred Option	Description	Summary of Sustainability Appraisal:
Provision within Centres	Further detail about the development of these ten schemes is proposed to be set out within the Draft Local Plan.	commercial services and the objective to protect and enhance the vitality and viability of centres. Recommended mitigation measures to improve the sustainability of this preferred option are largely focused on the design and form of development on these strategic sites, to ensure that heritage, landscape, townscape, public realm and transport and accessibility links are enhanced and adversely impacted on. The recommendations also include an emphasis on ensuring that the development of these strategic sites encourage a greater range of activities and uses in their centres and that these take place throughout the daytime and evening to encourage more people to visit.
Out of Town Shopping	The Preferred Options Consultation document recognises that there have previously been a number of large scale retail and leisure uses developed outside of the city and town centres. Whilst recognising that these out of centre development fulfil a specific role, the preferred option is to not expand these areas and ensure that they remain complementary to, and not compete with the proposed hierarchy of centres.	There were a range of potential effects identified against the objectives for this preferred option. Many were neutral or dependent on implementation but there were also two positive potential effects identified against the objectives relating to enabling access to the widest range of shopping and commercial services and to protect and enhance the vitality and viability of centres. The reasons for these potential positive effects were because the preferred option recognises the existing retail and service provision in out of centre locations but seeks to restrict their further expansion in the interest of focusing development towards the city and town centres. Recommended mitigation measures to improve the sustainability of this preferred option include ensuring that these locations are accessible using a range of transport modes, that the design of future redevelopment within these existing out of centre locations has a positive impact on landscape, townscape and access to green space and wider services and facilities.
Impact Threshold	A range of thresholds are proposed to be applied to major edge or out of centre retail developments to trigger a requirement for an assessment to be undertaken to determine the impact that they may have on Tier 1 and 2 centres. The thresholds proposed to be applied are for retail developments that exceed 1,500 square metres where there may be an impact on Tier 1 centres, 1,000 square metres where there may be an impact on Tier 2a centres and 300 square metres where there may be an impact on Tier 2b centres or lower	There were a range of potential effects identified against the objectives for this preferred option, most of which were unknown, uncertain or dependent on implementation. There were some positive potential effects identified against the objectives to conserve, enhance and promote interest in local distinctiveness, enable access to shopping and commercial services and to protect and enhance the vitality and viability of centres. The latter was identified as having a major potentially positive effect, given that the intention of the preferred option is to have strong policies to restrict the impact of out of centre retail on existing centres. Due to the specific scope of this preferred option, there were limited relevant mitigation measures that

Preferred Option	Description	Summary of Sustainability Appraisal:
	tiers in the proposed hierarchy.	can be recommended to improve its sustainability but those that were suggested included ensuring that cumulative impacts of different out of centre development schemes are taken in to account and that the preferred option should seek to support the achievement of an overall range and choice of uses within existing centres.
Green and Open Space	The councils preferred option is to provide a network of green and open space which supports the objectives of area's open and green space strategies. The preferred option will support target levels of open space provision and improve the quality of the network in terms of open space functions it provides within accessible locations from existing and future communities.	Most of the potential effects were identified as uncertain or dependent on implementation. Positive potential effects were identified against the objectives to increase life expectancy, improve health and mental well-being and provide the widest range of community, cultural and leisure services and facilities. A major positive potential effect was identified against the objective to maintain and enhance the quality and accessibility of green space, as this is the main focus of this preferred option. Mitigation measures that were recommended to improve the sustainability of this preferred option include ensuring that improvements are also made to biodiversity, the historic environment, landscape and townscape, accessibility by active modes of travel and that the design of green spaces leads to reductions and not increases to crime or the fear of crime.
Minerals	Planning for Mineral resources in Newcastle-under-Lyme is the responsibility of Staffordshire County Council and so this preferred option relates only to Stoke-on-Trent. It proposes to continue to safeguard appropriate areas of the city to ensure that development does not sterilise the potential to extract identified and viable mineral reserves.	Most of the potential effects were identified as either neutral or dependent on how this preferred option will be implemented. There were unknown or uncertain potential effects in regard to conserving, enhancing and promoting local distinctiveness, encouraging self-sufficiency in waste treatment and providing housing choice. There was a minor positive potential effect identified against the objectives to reduce contamination, regenerate degraded environments, re-use materials and maintain soil, geological and land resources and a major positive effect identified against the objective to ensure the efficient use of mineral resources. Recommended mitigation measures to improve the sustainability of this preferred option include ensuring that sites are properly remediated after extraction to ensure that the environment does not become degraded and that remediated sites can be considered for redevelopment to other uses such as housing, employment or green space.
Character Areas	In accordance with the Preferred Spatial Option, it is proposed to breakdown the plan area in to more detailed Character Areas. These will reflect the distinctive areas that exist within both authorities and set	All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying character areas within the Joint Local Plan, rather than providing detailed information about how

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	<p>out specific policy responses to cater for the individual needs of each area. They are also intended to enable more direct engagement with local communities.</p>	<p>policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.</p>