

Newcastle-under-Lyme Borough Council

Green Belt Safeguarded Land Advice

Assessing the need for safeguarded land

Reference: Final for Issue

| 8 July 2024

©







This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 294517-00

Ove Arup & Partners Limited
6th Floor 3 Piccadilly Place
Manchester
M1 3BN
United Kingdom
arup.com

Document Verification

Project title Green Belt Safeguarded Land Advice
Document title Assessing the need for safeguarded land
Job number 294517-00
Document ref
File reference

Revision	Date	Filename			
1	13 May 2024	Description	Draft for Issue		
			Prepared by	Checked by	Approved by
		Name	AO	JHB	JHB
		Signature			
2	8 July 2024	Filename			
		Description	Final for Issue		
			Prepared by	Checked by	Approved by
		Name	AO	JHB	JHB
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			

Issue Document Verification with Document

Contents

1.	Introduction	1
1.1	Overview	1
1.2	Policy Context	1
1.3	Recommended Approach	2
1.4	Assumptions and Limitations	3
2.	Stage 1 (Requirement)	4
2.1	Overview	4
2.2	Assessment	4
2.3	Conclusion	7
3.	Stage 2 (Quantum)	8
3.1	Overview	8
3.2	Current development needs	8
3.3	Projecting forward development needs	8
3.4	Conclusion	13

1. Introduction

1.1 Overview

In March 2024, Ove Arup & Partners ('Arup') was commissioned by Newcastle-under-Lyme Council ('the Council') to prepare additional Green Belt evidence to accompany their emerging Local Plan (Regulation 19).

Arup has undertaken a number of Green Belt Reviews for the Council consisting of the following:

- Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 1 (November 2017);¹
- Newcastle-under-Lyme and Stoke-on-Trent Green Belt Assessment Part 2 (2019-20) consisting of a Green Belt Site Review,² Exceptional Circumstances Review³ and Green Belt Village Study⁴; and
- Newcastle-under-Lyme Green Belt Review Part 3 (2023) consisting of advice on safeguarded land, compensatory improvements, and exceptional circumstances, plus additional Green Belt site assessments.⁵

The Green Belt Review Part 3 provided advice on safeguarded land as set out in paragraph 148 of the National Planning Policy Framework (2023) ('the NPPF') (previously paragraph 143 NPPF 2021) including a recommended approach to determine whether it is necessary and how to determine the quantum and location of safeguarded land.

The purpose of this report is to implement the recommendations set out in the Green Belt Review Part 3. These recommendations were based on a review of national policy and guidance and an understanding of the approaches adopted by nine other local authorities whose Local Plans had been tested at Examination and had been found sound.⁶ This report should therefore be read in conjunction with the Green Belt Review Part 3 however for ease of reference, the key recommendations relating to safeguarded land have been included here.

1.2 Policy Context

The starting point for understanding the requirements for safeguarded land is paragraph 148 of the NPPF, which states:

“When defining Green Belt boundaries, plans should:

(a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;

(b) not include land which it is unnecessary to keep permanently open;

(c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

¹ <https://www.newcastle-staffs.gov.uk/downloads/file/900/green-belt-assessment-part-1-2017->

² <https://www.newcastle-staffs.gov.uk/downloads/file/752/green-belt-part-2-assessment-study>

³ <https://www.newcastle-staffs.gov.uk/downloads/file/753/exceptional-circumstances-review>

⁴ <https://www.newcastle-staffs.gov.uk/downloads/file/754/green-belt-village-full-report>

⁵ <https://www.newcastle-staffs.gov.uk/downloads/file/1843/green-belt-assessment-part-3->

⁶ At the time of writing the Green Belt Review Part 3, Warrington Borough Council’s Local Plan had not been adopted however it was subsequently adopted on 4 December 2023.

(d) make clear that the **safeguarded land is not allocated for development at the present time**. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

(e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

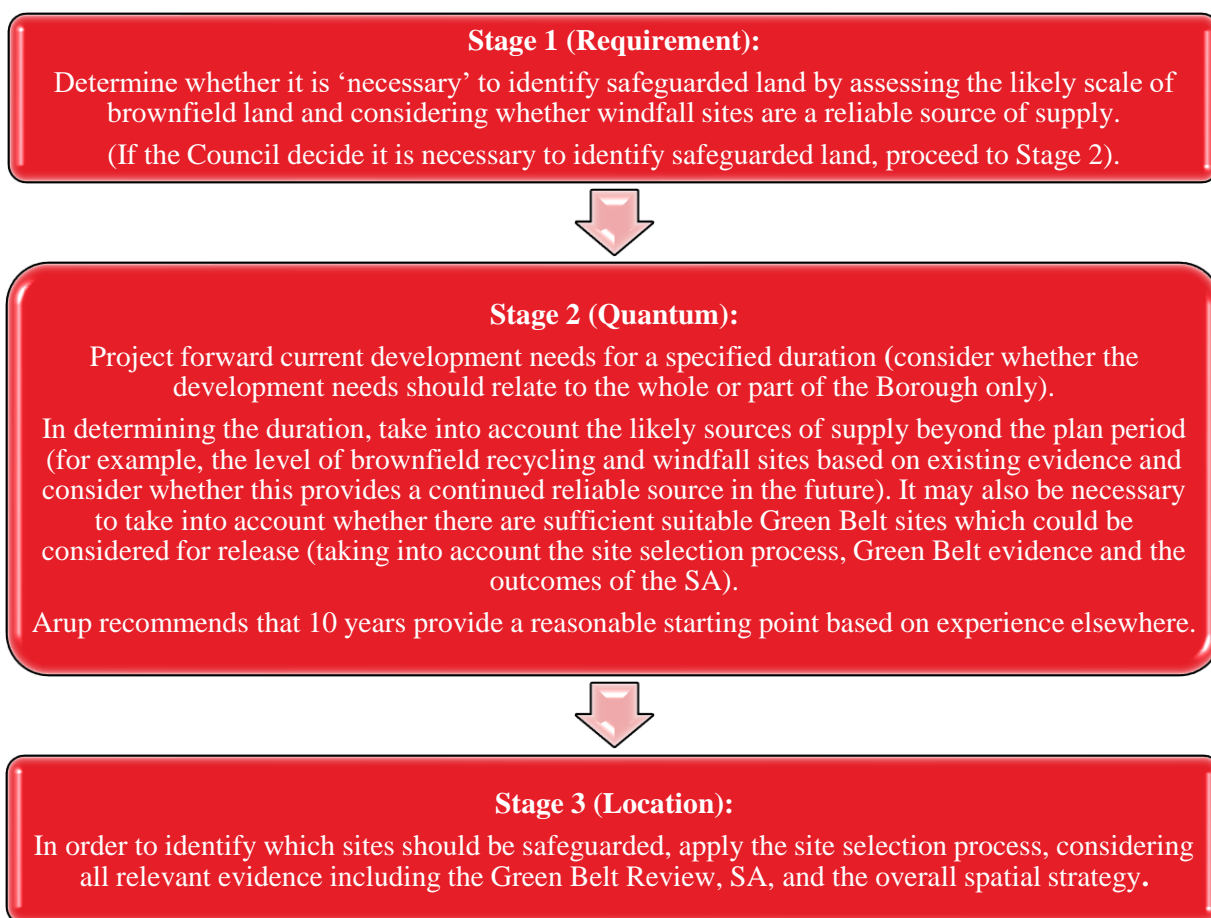
(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” (emphasis added)

In addition, paragraph 145 states “...Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, **so they can endure beyond the plan period**.” (emphasis added)

1.3 Recommended Approach

The Green Belt Review Part 3 at Section 2.4.5 set out the following three stage approach to determine firstly whether safeguarded land is ‘necessary’, and if it is, then to determine the quantum and location.

Figure 1. Recommended three stage approach to identifying safeguarded land.



The report recommended that the findings from other related studies and evidence should be taken into account including the Housing and Economic Needs Assessment (HENA) (2023 and 2024 Update), the Strategic Employment Site Assessment Report (2023), the Site Selection Report (June 2023), the Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Centre Regeneration Study (May 2023), the Strategic Housing and Employment Land Availability Assessment (SHELAA) (2022 and 2024 Update), the Green Belt studies, and the Sustainability Appraisal.

1.4 Assumptions and Limitations

In implementing the recommended approach, the following assumptions and limitations apply:

- Different local authorities and Local Plan Inspectors have taken different interpretations of paragraph 148 of the NPPF. There is no one size fits all approach and the need and associated justification for safeguarded land is specific to local circumstances, taking into account existing and emerging evidence but also policy reasons and wider plan-making factors.
- There are many uncertainties in determining whether safeguarded land is required. This assessment is therefore based on the published and emerging evidence base produced by the Council and through discussions with the Council to understand the most up to date position and local intelligence. Although this evidence forms the basis of the decision-making process, an element of professional judgement is also applied.
- This report provides an objective assessment of the need for safeguarded land taking into account all available evidence. It is up to the Council whether or not they chose the accept the findings and recommendations of this assessment. There may be policy reasons or other factors which mean they decide to take a different approach.

2. Stage 1 (Requirement)

2.1 Overview

The first stage considers whether it is ‘necessary’ to identify safeguarded land taking into account the following:

- The supply of urban sites, both brownfield and open spaces, and the likelihood that these will meet future needs beyond the plan period;
- The level of constraints on land supply across the Borough including Green Belt and/or other factors;
- Historic or anticipated rates of recycling of brownfield land and windfall delivery;
- The availability and deliverability of sites, in particular large strategic sites which may deliver beyond the plan period; and
- The preferences of plan-makers to incorporate a degree of flexibility for future plan iterations.

2.2 Assessment

In determining whether safeguarded land is necessary, there is a need to achieve a balance between protecting Green Belt and ensuring that Green Belt boundaries do not need to be altered again at the end of the plan period. As such, the factors which suggest it may be ‘necessary’ or ‘not necessary’ to identify safeguarded land are explored in Table 1 and considered in more detail below. This includes locally specific factors as well as more general considerations.

Table 1. Factors suggesting it may be necessary or not necessary to identify safeguarded land

Factors suggesting it may be necessary to identify safeguarded land	Factors suggesting it may not be necessary to identify safeguarded land
<ul style="list-style-type: none"> • Paragraph 145 and 148 NPPF requires local authorities to ensure boundaries endure well beyond the plan period. • As part of the exceptional circumstances case, the Council has explored all reasonable options before considering Green Belt land. At present there is a lack of suitable, available and achievable brownfield sites. • The Council is not aware of any future major brownfield opportunities towards the end of the plan period or beyond. • Land supply is tight in the latter part of the plan period evidenced by the Council’s SHELAA which shows there is a lack of developable brownfield sites towards the end of the plan period. • The vast majority of the proposed housing allocations in the emerging Local Plan will be delivered within the plan period. • The Green Belt boundaries in Newcastle-under-Lyme were last altered in 2003. Given this timely opportunity to review boundaries, it may therefore be logical to identify safeguarded land at this time. • The most sustainable locations for development in the Borough (the higher tiers of the settlement 	<ul style="list-style-type: none"> • There is considerable uncertainty in predicting longer term development needs, particularly taking into account wider economic uncertainties relating to the implications of Brexit, global instability, and changing migration patterns resulting from climate change and other factors. • The Government has proposed reforms to the planning system including to local plan-making. Thus, if the emerging Local Plan is adopted, these reforms are likely to result in the need for an early plan review. • A few of the proposed strategic housing allocations within the emerging Local Plan are long term and may deliver beyond the plan period (e.g CT1 and SP11). • The minimum housing requirement within this plan period is 8,000 dwellings however the total supply in the emerging Local Plan (including the proposed allocations) amounts to over 8,000 dwellings, in order to provide a degree of flexibility. • Windfall sites currently provide a reliable source of supply in the Borough (approximately 63 dwellings per annum). • Two strategic employment allocations are proposed in the emerging Local Plan which respond to the specific nature of employment need, the locationally specific criteria and evolving business requirements.

hierarchy consisting of the Newcastle-under-Lyme and Kidsgrove) are constrained by Green Belt.

Alongside other employment allocations, this amounts to approximately 85ha above the minimum employment land requirement. In addition, the delivery of these strategic employment allocations will continue beyond the plan period.

2.2.1 Factors suggesting safeguarded land may be necessary

A number of these factors are inextricably linked to the Council's exceptional circumstances case⁷ which is based on the acuteness of the housing and employment needs within the Borough; the lack of suitable, available and achievable non-Green Belt sites to meet identified development needs; the difficulties in achieving sustainable development without impinging on the Green Belt; and the nature and extent of harm to the Green Belt and the extent to which this can be reduced. In order to meet development needs within this plan period, the Council has examined all reasonable options before considering Green Belt land. This includes exploring sites within the existing urban area, making use of brownfield land, optimising density, considering sites beyond the Green Belt (i.e. in the countryside), and through discussions with neighbouring authorities. This assessment concluded there was insufficient suitable non-Green Belt land to meet needs and no other neighbouring authority was able to accommodate any of the Newcastle-under-Lyme's housing needs, particularly given the challenges faced in meeting their own needs.

Exploring the Council's brownfield land supply in more detail, the Council's exceptional circumstances case confirms that Newcastle-under-Lyme has a limited amount of brownfield land and of this total supply, even less could be considered appropriate for redevelopment. All suitable brownfield sites have been allocated in the emerging Local Plan. Although this represents a point in time, it could reasonably be assumed that the Council's brownfield land supply is unlikely to significantly increase in the future unless there is significant intervention or changes in circumstance. Furthermore, the Council has confirmed that they are not aware of any future major brownfield opportunities which are likely to come forward towards the end of the plan period or beyond. Land supply is already tight in the latter part of the plan period evidenced by the Council's SHELAA which shows there is a lack of developable brownfield sites towards the end of the plan period. In addition, the vast majority of the proposed housing allocations in the emerging Local Plan will be delivered within the plan period. Taking all of these factors together, it is highly likely that further Green Belt land will be required for housing beyond the end of the plan period.

The Council has not altered Green Belt boundaries since the Newcastle-under-Lyme Local Plan (2003). The Joint Core Strategy (with Stoke-on-Trent) adopted in 2009 did not alter the Green Belt boundary. Given this timely opportunity to review boundaries, it may therefore be logical to identify safeguarded land at this time in order to avoid the need to potentially review boundaries again at the end of the plan period.

Safeguarding is particularly significant for influencing the future pattern of development. The Council has a defined settlement hierarchy which identifies the most sustainable locations for development in the Borough. This consists of the Newcastle-under-Lyme urban area and Kidsgrove, both of which are constrained by Green Belt. The next tier down consists of the rural centres which will also meet some of the Borough's development needs. These rural centres consist of Audley and Bignall End (joint), Baldwins Gate, Betley and Wrinehill (joint), Keele Village (with University Hub), Loggerheads, Madeley and Madeley Heath (joint). Six of the nine rural centres are constrained by Green Belt.⁸ It would be reasonable to assume that the most sustainable locations for development identified in the settlement hierarchy will continue to apply in the future. However, it is acknowledged that increased investment in infrastructure in these areas in the future could mean that some of these rural centres may be able to accommodate increased growth or an alternative growth strategy could identify the potential for a new settlement outside of the Green Belt.

⁷ <https://www.newcastle-staffs.gov.uk/downloads/file/1852/exceptional-circumstances-for-green-belt-release-2003->

⁸ This includes Audley, Bignall End, Betley, Wrinehill, Keele Village (with University Hub), and Madeley Heath. Whilst Baldwin's Gate and Madeley are partly constrained by Green Belt, they also have the ability to grow in the other direction outside of the Green Belt. Loggerheads is not constrained by Green Belt.

2.2.2 Factors suggesting safeguarded land may not be necessary

Safeguarding land presents the dilemma of the scale of future needs being unknown making it difficult to balance possible need for more Green Belt release against the benefits of retaining land in the Green Belt.

There is considerable uncertainty in predicting longer term development needs, particularly taking into account wider economic uncertainties relating to the implications of Brexit, global instability, and changing migration patterns resulting from climate change and other factors. The approach to determining the quantum of safeguarded land adopted by many local authorities involves projecting forward development needs. This is not a perfect approach as it is likely that development needs for Newcastle-under-Lyme will be different post-2040 and the level of change is unknown and impossible to predict. For example, in relation to the housing requirement, assuming the standard method is still retained as the approach, the household projections and future affordability ratios are likely to have changed. However, in the absence of an alternative, the current housing and employment requirements provides the only reliable basis at this point in time for determining the amount of safeguarded land.

The Government has proposed reforms to the planning system which will have implications for plan-making. The changes made as part of the Levelling Up and Regeneration Act 2023 ('the Act') are part of a wider reform programme which intends to speed up the plan-making process. The Act gives the Government the power to set a mandatory timetable for local plan preparation. The Government has said, alongside the Act, it will update regulations to require local authorities to produce local plans within 30 months and update them every five years.⁹ The regulations, policy and guidance to enable the preparation of local plans under the new plan-making process are due to be in place by Autumn 2024.

The Government has proposed replacing the current requirement for local authorities to review their local plans at least once every five years from their adoption date with a new requirement for local authorities to update their local plans every five years.¹⁰ Local planning authorities must submit their local plans for examination by 31 June 2025 (and adopt them by 31 December 2026) if they want their local plans to be adopted under the old plan-making system. Local plans which were prepared under the old plan-making system will continue to be considered 'up-to-date' for the first 30 months of the new plan-making system.¹¹ Thus, if the emerging Local Plan is adopted under the existing system, these reforms are likely to result in the need for an early plan review. In light of this uncertainty and the potential changes to the plan-making system, the Council may therefore wish to defer the issue of safeguarded land to the first plan review. In addition, although there is no suggestion that the duration of a 'plan period' is likely to change, the more regular reviews will mean that the plan period will be constantly rolling over which could also have implications for paragraph 145 and 148 NPPF.

In relation to housing, the minimum housing requirement within this plan period is 8,000 dwellings however in order to provide a degree of flexibility the total supply in the emerging Local Plan (including the proposed allocations) amounts to over 8,000 dwellings. Thus, if there is a residual amount of housing land remaining at the end of the plan period, it would be reasonable to assume that this land will be available for development in the next plan period. In addition, a few of the proposed strategic housing allocations within the emerging Local Plan are long term and will deliver beyond the plan period (e.g CT1 and SP11).

The Council's Five Year Housing Land Supply Statement (2023-2028)¹² also confirms that windfall sites currently provide a reliable source of supply in the Borough. Based on annual windfall completions between 2008 and 2023, on average, windfall sites have provided 63 dwellings per year. This may fluctuate in the future although given that this time period included the adoption of the previous Joint Core Strategy (with Stoke-on-Trent) (adopted 2009), it would be reasonable to assume that windfall sites will continue to contribute to housing delivery in the future.

⁹ <https://researchbriefings.files.parliament.uk/documents/CBP-9911/CBP-9911.pdf>

¹⁰ <https://researchbriefings.files.parliament.uk/documents/CBP-9911/CBP-9911.pdf>

¹¹ <https://researchbriefings.files.parliament.uk/documents/CBP-9911/CBP-9911.pdf>

¹² <https://moderngov.newcastle-staffs.gov.uk/documents/s42332/2023-28%20Five%20Year%20Housing%20Land%20Supply%20Statement%20Report.pdf>

In relation to employment needs, the Council is proposing two strategic employment allocations in the emerging Local Plan (Site AB2 and Site KL15). These employment allocations respond to the specific nature of employment need, the locationally specific criteria and evolving business requirements, as evidenced in the Council's Strategic Employment Sites Assessment (April 2024). At the present time, this is focused around knowledge-based industries (KL15) and large-scale logistics-focused development (AB2). The proposed allocations will contribute to the wider employment needs of the West Midlands region and the North Staffordshire sub-region where there is an identified demand.

The Council has identified a minimum employment land requirement of 63ha (Policy PSD1). The proposed strategic employment allocations (totalling circa 70ha) combined with the existing supply of employment land at 48.9ha would in aggregate terms exceed the minimum requirement. It is acknowledged, however, that there are identified quality issues with some of the existing supply (as stated in the Council's Further Update HENA & Strategic Employment Sites Assessment - April 2024), they have varying development statuses (e.g. being under construction), and the strategic sites are prospectively suited to addressing in part local and sub-regional/regional needs. Nonetheless, if there is a residual amount of employment land remaining at the end of the plan period, it would be reasonable to assume that this land will be available for development in the next plan period. Furthermore, it is feasible that the proposed strategic employment allocations will continue delivering beyond the plan period. Given that employment sites are quite specific in their locational needs and criteria, linking either to market demand, surrounding uses, the strategic road network, or the needs of local businesses, it would be difficult to predict both the nature of employment needs post-2040, plus the suitability of potential sites. Taken together, all of these factors suggest it is not necessary for the Council to identify safeguarded land for employment needs beyond the plan period.

2.3 Conclusion

Paragraph 148 NPPF requires that, when defining Green Belt boundaries, authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period; and where necessary, identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. As per the NPPF, safeguarded land is removed from the Green Belt and safeguarded to meet future development needs, but it is not allocated for development.

The Council is unable to meet their development needs within this plan period to 2040 without making changes to the Green Belt boundary. Without a good indication of the availability of non-Green Belt sites post-2040, the Council could not be certain that the existing Green Belt boundary would endure throughout the next plan period (assumed for this purpose to be 2040-2055). In relation to housing, there is nothing to suggest that the existing factors which have collectively formed the Council's current exceptional circumstances case will have significantly changed post-2040. This indicates that further Green Belt land is likely to be required for housing beyond the end of the plan period.

In relation to employment land, the Council's employment allocations in the emerging Local Plan exceed the identified minimum employment land requirement. In addition, the proposed strategic employment allocations are long term and are likely to continue to deliver beyond the plan period. Employment needs are therefore likely to be met well beyond the plan period. In addition, it would be extremely difficult both to forecast the needs of businesses and to identify suitable employment sites post-2040 given changing market demands and the locationally specific criteria relating to employment sites.

Based on the above considerations, it could be argued that it is necessary to identify safeguarded land for future housing needs in order to ensure that the Green Belt boundary does not need to be altered at the end of the plan period. There does not appear to be a compelling argument to identify safeguarded land for future employment needs. The quantum therefore becomes the next relevant consideration as set out in Section 3 below.

3. Stage 2 (Quantum)

3.1 Overview

If the Council decide it is necessary to identify safeguarded land, the next stage is to determine the quantum of safeguarded land required. Paragraph 143 of the NPPF confirms that the safeguarded land should “...meet longer-term development needs stretching well beyond the plan period.”

The NPPF confirms that 15 years is the minimum time period for a Local Plan therefore it is assumed that the next plan period will be 2040-2055. The amount of safeguarded land must be sufficient to ensure that Green Belt boundaries do not need to be amended again until 2055 at the very earliest.

This does not mean that the Council must identify sufficient safeguarded land to meet the full 15 years of future projected development needs, as inevitably, there will be a number of other sources of land suitable for development such as infill, brownfield and other windfall opportunities that will be available to make up the difference. In reviewing the approaches taken by other local authorities (see Green Belt Review Part 3), it was found that most local authorities projected forward current development needs for a specified duration. This duration ranged from 5 to 10 years based on an understanding of the likely sources of supply beyond the plan period. Arup recommends that 10 years provides a reasonable starting point. If there is a high level of brownfield recycling and windfall sites and these are likely to be a continued reliable source in the future, then it may be possible to reduce the amount of safeguarded land to be sufficient to meet 5 years of future projected requirements. Providing safeguarded land to meet fewer years of projected development requirements implies that there will be more reliance on other sources of land.

It is important to note that whilst some authorities consider the availability of suitable Green Belt sites for release as a factor in determining the quantum of safeguarded land,¹³ this report has been prepared without consideration of the availability of suitable Green Belt sites, taking a demand-based approach to determining the quantum rather than a supply-based approach. This is due to the timing of the preparation of this report alongside the emerging Local Plan. In taking forward the recommendations of this report, the Council may find there are insufficient suitable Green Belt sites to meet the recommended quantum of safeguarded land and this will need to be a determining factor in the Council’s decision making process.

3.2 Current development needs

The housing requirement set out in the emerging Local Plan is 400dpa. This has been calculated based on the minimum local housing need requirement of 347dpa (as of March 2023) (calculated using the standard method) with an additional uplift to support the envisaged jobs growth linked to the strategic employment allocations. The HENA Further Update (April 2024) confirms that this aligns with average past delivery over the last five years (399dpa).

Given the housing requirement has been uplifted to align with the jobs growth associated with the strategic employment allocations, it could be argued that this uplift may not be necessary in the next plan period and the minimum local housing need requirement based on the standard method (347dpa) should therefore be projected forward. Both options have been considered for completeness.

3.3 Projecting forward development needs

It is acknowledged that projecting forward current development needs beyond 2040 is a relatively simplistic approach. There are a variety of reasons why the Council’s housing requirement could be different post 2040. Assuming the standard method is still retained as the approach, the household projections and future affordability ratios are likely to have changed. The level of change is unknown and could not be predicted. The only alternative would be to try and make a separate estimate of needs for the period 2040-2055. Given the timescales involved, it is considered this would neither be accurate nor realistic. As such, the current housing requirement provides the only reliable basis at this point in time for determining the amount of safeguarded land.

¹³ See example of Barnsley Council and St Helen’s Council in the Green Belt Review Part 3.

The likely sources of land supply that might be relevant after 2040 are considered in turn below. These sources cannot simply be added together to provide an amount of potential land as this would result in double counting however they provide an indication of the range of potential sources which assists in coming to an informed judgement on the duration to project forward development needs.

3.3.1 Distribution of development within this plan period

The usual approach to projecting forward development needs would be to do this for the whole of the Borough, however given that a large proportion of the Borough is located beyond the outer Green Belt boundary, it is necessary to consider the implication of this taking into account the likely distribution of housing development. It would not be appropriate to designate safeguarded land to accommodate potential future needs arising in other areas of the Borough outside of the Green Belt.

Within the settlement hierarchy, the rural centres of Loggerheads, Baldwin’s Gate, and Madeley are either located beyond the outer Green Belt boundary or on the edge of the outer Green Belt boundary. Loggerheads is entirely beyond the Green Belt and is not constrained by Green Belt. Baldwin’s Gate and Madeley are located on the edge of the outer Green Belt boundary and have the ability to grow in the other direction.

Based on the proposed distribution of housing development in the emerging Local Plan, the proportion of development within each settlement has been used to give an indication of the likely scale of development in locations beyond the Green Belt. Based on Table 2 below, it is assumed that approximately 10% of the future development needs will be located in the settlements beyond or on the edge of the outer Green Belt boundary. This 10% will therefore be deducted after projecting forward development needs. The current growth strategy is based on an understanding of the sustainability of these settlements (as set out in the Council’s Rural Area Topic Paper (August 2024))¹⁴ therefore this is considered to be a reasonable (albeit conservative) estimate based on current evidence. It is acknowledged that the Council’s future growth strategy may change post-2040 resulting in more or less development in these settlements however it is not possible to predict this.

Table 2. Distribution of Development in emerging Local Plan

Settlement hierarchy	Settlement	Distribution of Development (dwellings)	Proportion
Strategic centre	Newcastle-under-Lyme	5,200	65%
Urban centre	Kidsgrove	800	10%
Rural centre	Audley and Bignall End (joint)	250	3%
Rural centre	Baldwin’s Gate	250	3%
Rural centre	Betley and Wrinehill (joint) and Madeley and Madeley Heath (joint)	250 ¹⁵	3%
Rural centre	Loggerheads	450	6%
Rural centre	Keele and Keele University (joint)	800	10%
Total		7,250	

3.3.2 Potential for surplus housing land from this plan period

In this plan period, the Council propose to provide sufficient land to meet the housing requirement of 8,000 net additional dwellings. In order to assist with short term deliverability and to ensure that the full 8,000 is provided by 2040, slightly more land than is required to meet the identified housing requirement is proposed to be allocated.

¹⁴ <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-consultation>

¹⁵ 150 dwellings are proposed on site MD29 in Madeley on land beyond the Green Belt

If all allocated housing land is fully developed during this plan period, thus resulting in over 8,000 dwellings being delivered by 2040, it could be argued that this will reduce development requirements by an equivalent amount in the next plan period.

Alternatively, if 8,000 dwellings are delivered by 2040, a residual amount of land will remain at the end of the plan period (theoretically equal to the amount that is ‘overprovided’ now). In this case, it would be reasonable to assume that this land will be available for development in the next plan period.

In either scenario, within the context of the overall requirements post-2040, any surplus may well be modest, but would nonetheless contribute to needs in the next plan period.

3.3.3 Urban Capacity and Town Centre Regeneration Study

The Council has prepared an Urban Capacity and Town Centre Regeneration Study (June 2023)¹⁶ focused on the town centres of Newcastle-under-Lyme and Kidsgrove. This analyses the potential for additional urban capacity, beyond that identified in the Council’s SHELAA 2022. The study notes that the Council’s SHELAA had identified no sites in Kidsgrove town centre, and sites with a capacity of 248 dwellings in Newcastle-under-Lyme town centre.

As a result of the analysis, the study identified eight sites in Newcastle-under-Lyme town centre with a total additional potential supply of 272 homes and two sites in Kidsgrove town centre with a total additional potential supply of 54 homes. A small component of mixed-use development was also identified as potentially being integrated within a limited number of the sites in Newcastle-under-Lyme. The study notes that further work is required to clarify the nature and extent of potential constraints on these sites. As such, they do not form part of the residential supply for the Borough at the current point in time. The sites are therefore considered to be ‘potentially suitable’ (constrained). None of the sites were identified as being ‘deliverable’ or ‘developable’ at the current point in time with viability challenges and other constraints identified. The study anticipates that none of the sites would be delivered within the next 10 years.

It could reasonably be concluded that these sites are therefore unlikely to come forward during this plan period, but they may well come forward post-2040. Whilst it cannot be certain that an additional 326 dwellings will all come forward, this figure does suggest that it is possible that the rate of brownfield recycling could increase in the future.

3.3.4 Windfall development

Annex 2 (Glossary) of the NPPF defines windfall sites as: “*Sites not specifically identified in the development plan*”.

It is necessary to consider whether windfall sites will provide a reliable source of supply in the future taking into account evidence on past trends. The Council’s Five Year Housing Land Supply Statement (2023-2028)¹⁷ confirms that windfall sites currently provide a reliable source of supply in the Borough. Figure 4 of the document shows the annual windfall completions between 2008 and 2023. This shows that on average, windfall sites have provided 63 dwellings per year. Table 3 below considers windfall completions as a proportion of total net dwelling completions over the same time period. This shows that on average, from 2008-2023 windfalls completions accounted for 22% of the housing supply. Whilst it is likely that development on windfall sites will reduce once the Local Plan is adopted, Table 3 below shows that in the years immediately after the adoption of the previous Joint Core Strategy (with Stoke-on-Trent) in 2009, windfall completions still formed around 10% of the supply.

As such, it could reasonably be assumed that windfall sites will continue to make an important contribution to the overall supply of housing. If the average windfall completion rate of 63 dwellings per year continues into the next plan period, this would equate to 945 dwellings or 2.4 years of supply. Even if windfall completions dropped by half to 32 dwellings a year, this would equate to 480 dwellings over the next plan period, or 1.2 years of supply.

¹⁶ <https://www.newcastle-staffs.gov.uk/downloads/file/1849/urban-capacity-and-town-centre-regeneration-study-2023->

¹⁷ <https://moderngov.newcastle-staffs.gov.uk/documents/s42332/2023-28%20Five%20Year%20Housing%20Land%20and%20Supply%20Statement%20Report.pdf>

Table 3. Windfall completions as a proportion of net dwelling completions

Year	Net dwellings completions ¹⁸	Windfall completions ¹⁹	Windfall completions as a proportion of total net completions (%)
2008-09	277	48	7
2009-10	207	47	23
2010-11	183	21	11
2011-12	251	27	11
2012-13	414	31	7
2013-14	295	33	11
2014-15	219	26	12
2015-16	154	61	40
2016-17	412	253	61
2017-18	263	40	15
2018-19	236	60	25
2019-20	320	32	10
2020-21	631	54	9
2021-22	221	120	54
2022-23	248	87	35
Total	3,862	940	22

3.3.5 Strategic Housing and Employment Land Availability Assessment

The Council's SHELAA (2024)²⁰ provides a snapshot of all potential sources of housing and employment land supply at the present time based on best available information. This shows that non-Green Belt sites which are deemed to not be 'deliverable'²¹ and 'developable'²² at the current time have a combined capacity of 8,151 dwellings. Of these sites, a large proportion of them are deemed to not be 'suitable' for housing (equating to 7,032 dwellings) whilst a number of them are to be 'unavailable' at the present time (equating to 3,875 dwellings).²³

¹⁸ Annual Monitoring Report (2012-2021) – Available at: <https://www.newcastle-staffs.gov.uk/downloads/file/1439/2021-to-2012-annual-monitoring-report>

¹⁹ <https://moderngov.newcastle-staffs.gov.uk/documents/s42332/2023-28%20Five%20Year%20Housing%20Land%20Supply%20Statement%20Report.pdf>

²⁰ <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-consultation>

²¹ Deliverable is defined in relation to the timescales for delivery and the planning status of a site. The NPPF states "...sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years." (Annex 2).

²² Developable is defined in the NPPF as "...in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged". (Annex 2)

²³ Note: Some of these are both unavailable and unsuitable.

The suitability of a site takes into account a number of factors as detailed in the SHELAA methodology (2022)²⁴. Whilst some of these factors are unlikely to have changed post-2040 (for example where a site is in Flood Zone 3 or there are major heritage constraints, or national or international environmental designations), other constraints such as highways issues, amenity issues, and access to services and facilities could potentially change in the future. Alternatively new evidence may emerge which could demonstrate that mitigation is possible.

Where a site is not considered to be available, this is due to a number of reasons such as the site is not being promoted for development, the site is in active use, there are ownership or tenancy issues, or investigations have been carried out and it is not possible to determine if the site is available. The availability of a site is likely to change in the future and a number of these sites may become available post-2040.

Taking this account, this represents a sizeable stock of potential non-Green Belt sites which could contribute to housing provision post-2040 and which could therefore justify a reduction in the amount of safeguarded land.

3.3.6 Other ways of meeting future needs

Whilst making predictions on planning issues beyond 2040 is very difficult, there are likely to be a number of further options available to accommodate development requirements. These may include:

- Further recycling of land within the urban areas – as set out above, the Council has already analysed the potential for additional urban capacity within the town centres of Newcastle-under-Lyme and Kidsgrove. This takes into consideration the ongoing regeneration and investment programmes in these town centres however it is possible that future town centre regeneration initiatives will encourage further recycling of land and result in additional urban capacity beyond that identified.
- Channelling development to locations beyond the Green Belt – there are a number of rural centres and smaller villages beyond the outer Green Belt boundary however the lack of service provision in many of these settlements limits the level of development that could be sustainably accommodated. Whilst service provision changes over time, it is not possible to anticipate this post-2040. The Council’s Rural Area Topic Paper (August 2024)²⁵ identifies the most sustainable settlements within the rural part of Newcastle-under-Lyme. It provides a full audit of facilities in the rural area to understand the role of these settlements. Whilst the vast majority of the settlements beyond the outer Green Belt boundary have no existing services or facilities and are not considered sustainable locations for growth,²⁶ the settlements of Loggerheads, Baldwin’s Gate and Madeley are considered to be ‘Rural Centres’ which provide a significant role in service provision to the local population. As such, dependent on the Council’s future growth strategy, it may be possible to accommodate further development in these settlements subject to improvements in infrastructure and impacts on character and identity. Furthermore, an alternative growth strategy in the future could be to identify a new settlement outside of the Green Belt.

3.3.7 Safeguarded land calculation

Taking the above points together, it is considered that there are sufficient grounds to reduce the initial starting point of 10-years down to 7.5 and 5 years. For completeness, all of these durations have been tested in Table 4 and 5 below. Table 4 projects forward the identified housing requirement of 400dpa whilst Table 5 projects forward the local housing need requirement based on the standard method without the additional uplift (347dpa).

A reduction of 10% is then applied to exclude settlements beyond or on the edge of the outer Green Belt boundary. In both scenarios, a ‘straight line projection’ has been used as adjustments to take account of economic or demographic changes are not considered appropriate due to limitations associated with identifying and applying a consistent approach to adjustment factors.

²⁴ <https://www.newcastle-staffs.gov.uk/downloads/file/1566/strategic-housing-and-employment-land-availability-assessment-shelaa-methodology-july-2022->

²⁵ <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-consultation>

²⁶ This includes: Ashley, Chapel Chorlton, Hales, Maer, Knighton, Mucklestone, and Onneley.

Table 4. Safeguarded land calculation (number of dwellings) based on 400dpa

	Project forward 5 years	Project forward 7.5 years	Project forward 10 years
Housing requirement (Borough wide)	2,000 dwellings	3,000 dwellings	4,000 dwellings
Reduction of 10% to exclude settlements beyond or on the edge of the outer Green Belt boundary	1,800 dwellings	2,700 dwellings	3,600 dwellings

Table 5. Safeguarded land calculation (number of dwellings) based on 347dpa

	Project forward 5 years	Project forward 7.5 years	Project forward 10 years
Local housing need requirement (standard method) (Borough wide)	1,735 dwellings	2,603 dwellings	3,470 dwellings
Reduction of 10% to exclude settlements beyond or on the edge of the outer Green Belt boundary	1,562 dwellings	2,342 dwellings	3,123 dwellings

Given that no employment land is proposed to be safeguarded, it has not been considered necessary to convert the number of dwellings into a land requirement. The density assumptions identified in the SHELAA Methodology (2022)²⁷ vary significantly based on wards, ranging from 20dph in ‘Loggerhead, Maer & Whitmore, Keele’ to 50/180dph in Newcastle-under-Lyme town centre. It is therefore considered most appropriate for the Council to take into account the densities relevant to the location of any proposed safeguarded land.

3.4 Conclusion

For the purposes of determining the quantum of safeguarded land, the current development needs for housing during this plan period have been projected forward. A reduction of 10% has then been applied to account for a proportion of the development needs being accommodated in settlements beyond or on the edge of the outer Green Belt boundary.

A duration of 10 years has been used as a reasonable starting point for projecting forward development needs however the following sources of potential future supply suggest that there are sufficient grounds to reduce this down to 7.5 or 5 years:

- Slightly more land than is required to meet the identified housing requirement is proposed to be allocated. Whilst the surplus is likely to be modest, this would contribute to housing needs in the next plan period thus slightly reducing the need for safeguarded land.
- The Urban Capacity and Town Centre Regeneration Study identifies an additional 326 dwellings which are unlikely to come forward during this plan period. This could provide a potential source of supply post-2040 and suggests that it is possible that the rate of brownfield recycling could increase in the future.
- If the average windfall completion rate continues into the next plan period, this would equate to 945 dwellings or 2.4 years of supply. Even if windfall completions dropped by half, this would equate to 480 dwellings (1.2 years supply) over the next plan period.
- Within the SHELAA, there is a sizeable stock of potential non-Green Belt sites which could contribute to housing provision post-2040. These sites have a combined capacity of 8,151 dwellings however they are

²⁷ <https://www.newcastle-staffs.gov.uk/downloads/file/1566/strategic-housing-and-employment-land-availability-assessment-shelaa-methodology-july-2022->

assessed as not suitable and available at the present time. There is potential that this could change in the future which could therefore justify a reduction in the amount of safeguarded land.

- Future town centre regeneration initiatives in the future could encourage further recycling of land and result in additional urban capacity.
- Dependent on the Council’s future growth strategy, it may be possible to accommodate increased amounts of development in settlements on the edge of or beyond the outer Green Belt boundary. Furthermore, an alternative growth strategy in the future could be to identify a new settlement outside of the Green Belt.

Based on the above factors, it is recommended that the Council consider either 5 or 7.5 years worth of safeguarded land, as set out in Table 6 below.

Table 6. Safeguarded land recommendations (number of dwellings)

	Project forward 5 years and reduce by 10%	Project forward 7.5 years and reduce by 10%
Housing requirement (400dpa)	1,800 dwellings	2,700 dwellings
Local housing need requirement (standard method) (347dpa)	1,562 dwellings	2,342 dwellings

Both the housing requirement of 400dpa and the minimum local housing need figure of 347dpa (based on the standard method) have been projected forward. The additional uplift on the minimum local housing need figure during this plan period is required to support the envisaged jobs growth linked to the strategic employment allocations. Whilst these allocations are long term and are likely to continue to deliver beyond the plan period, it could reasonably be assumed that the uplifted housing requirement during this plan period will result in sufficient labour supply to align with the proposed employment growth so as not to require the uplift into the next plan period. In addition, other factors such as commuting patterns may mean that there is sufficient labour force.

It is therefore recommended that safeguarded land sufficient to accommodate between 1,562 and 2,342 dwellings is identified. Although it is recommended that the Council take into account the densities relevant to the location of any proposed safeguarded land, as an indicator, assuming an average density of 35dph, this would equate to between 45ha and 67ha. Given the issues relating to uncertainty set out in Section 2.2.2, both in predicting longer term development needs and in relation to the proposed reforms to the planning system, the Council may wish to take a more cautious approach and opt for the lower end of the scale (1,562 dwellings or 45ha).

It is important to note that in determining the recommended quantum of safeguarded land, this report has been prepared without consideration of the availability of suitable Green Belt sites, taking a demand-based approach to determining the quantum rather than a supply-based approach. This is due to the timing of the preparation of this report alongside other evidence in the emerging Local Plan. In taking forward the recommendations of this report, the Council will need to consider other relevant evidence including the Green Belt assessments, the site selection process, and the sustainability appraisal. Taking all of this into consideration, the Council may find there are insufficient suitable Green Belt sites to meet the recommended quantum of safeguarded land, and this will need to be a determining factor in the Council’s decision-making process.

As stated in Section 1.4, it is important to reiterate that this report provides an objective assessment of the need for and quantum of safeguarded land taking into account all available evidence. It is up to the Council whether or not they chose to accept the findings and recommendations of this assessment. There may be policy reasons or other factors which mean they decide to take a different approach.