



# **Housing Spatial Strategy Topic Paper**

## **Newcastle Under Lyme – Local Plan (Regulation 19)**

**July 2024**

## **1 Introduction**

- 1.1 The purpose of this topic paper is to provide a summary of the process that has led to defining the local plan spatial strategy for housing. This paper is published alongside the current consultation on the Newcastle-under-Lyme Local Plan 2020-2040 (Regulation 19).
- 1.2 The discussion in this paper is primarily housing led with detailed matters regarding the spatial strategy for employment set out in a separate topic paper. The proposed quantum of development for housing and employment are closely aligned and relate to the preferred economic growth scenario identified through the HENA (2024). Discussion regarding the site selection approach for the identification of sites for Gypsy and Travellers and Travelling Showpeople is set out in the site selection paper (ED019).
- 1.3 The proposed housing spatial strategy has been prepared in consideration of national and local policy, key evidence studies, Sustainability Appraisal (SA), and responses received to the previous local plan consultation stages. The SA Report provides further detail on the process of establishing reasonable alternative growth scenarios and defining the local plan spatial strategy.
- 1.4 The SA Report, full range of topic papers and evidence that has informed the proposed housing spatial strategy can be viewed on the council's website <https://www.newcastle-staffs.gov.uk/planning-policy>

### **Overview of Topic**

- 1.5 The spatial strategy sets out the overall proposed distribution for housing growth in the borough of Newcastle-under-Lyme over the plan period to 2040. It sits alongside the plan objectives and sets out the quantum, location, and type of growth (including proposed strategic allocations) that the plan is seeking to deliver and how this will be supported. The proposed spatial strategy is supported by a suite of policies in the Regulation 19 Local Plan 2020-2040.
- 1.6 The process of defining the spatial strategy has involved consideration of reasonable alternative growth scenarios which is discussed further in this paper. A range of factors have influenced the discussion of reasonable growth scenarios including the strategic objectives of the Plan, 'strategic factors', and site options. Strategic factors include objectively assessed housing needs and 'Broad Distribution' factors that consider which broad areas of the plan area are more sustainable to accommodate growth.

## **2 Policy Context**

### **National Policy Context**

- 2.1 Local planning authorities are required to address the requirements set out in National planning guidance in preparing their local plans, namely the National Planning Policy Framework (NPPF, December 2023) and the National Planning Practice Guidance (PPG).

### **National Planning Policy Framework (December 2023)**

- 2.2 At the heart of the NPPF is a presumption in favour of sustainable development, which plans should pursue positively throughout their preparation. Paragraph 7 in the NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.
- 2.3 Paragraph 8 states that achieving sustainable development requires the planning system to have the three overarching objectives of economic, social and environmental sustainability, which are interdependent and need to be pursued in mutually supportive ways. The social objective specifically highlights the importance of supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. It notes this can be secured by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health social and cultural well-being.
- 2.4 Paragraph 11 covers the presumption in favour of sustainable development. For plan making this means that:
- a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
  - b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through statements of common ground), unless
    - i. The application of policies in the framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution in the plan area, or
    - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole.

- 2.5 Paragraph 20 requires strategic plan policies to set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
  - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - c) community facilities (such as health, education and cultural infrastructure); and
  - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.6 Paragraph 22 states that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 2.7 Paragraph 23 requires that broad locations for development should be indicated on a key diagram, and land-use designations identified on a proposals map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of 5 sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).
- 2.8 Paragraph 35 states that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
- a) **Positively prepared** in providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;
  - b) **Justified** by providing an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) **Effective** in being deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters; and
  - d) **Consistent with national policy** in enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

- 2.9 In order to support the Government's objective of significantly boosting the supply of homes, paragraph 60 in the NPPF states it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.10 Paragraph 61 sets out that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 2.11 Paragraphs 69 and 70 concern the provision of supply to meet the housing requirement. From a strategic housing land availability assessment, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) Specific, deliverable sites for years 1-5 of the plan period; and
  - b) Specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan.
- 2.12 Paragraphs 82 and 83 refer to rural areas, where plan policies should reflect local needs, including provision of community led development and affordable housing. In rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and the services they support, to enable them to thrive. Where there are groups of smaller settlements in rural areas, it is noted that development in one may support services in another nearby settlement.
- 2.13 Paragraph 88 advises that planning policies and decisions should enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural building, public houses and places of worship.
- 2.14 Paragraph 90 confirms the key role that town centres play at the heart of local communities and sets out that plans should support their growth, management and adaptation, to promote long term viability and vitality. The NPPF advises authorities to recognise that a suitable mix of uses in town centres (including housing) can help to promote vitality.
- 2.15 Paragraph 97 states that to provide the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues,

open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

- 2.16 Paragraph 109 advises that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. However, the NPPF recognises that opportunities to maximize sustainable transport solutions will vary between urban and rural areas, and that this should be taken into account in plan-making.
- 2.17 Paragraph 110 notes that planning policies should support an appropriate mix of uses across an area and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.
- 2.18 Paragraph 123 states that plans and decisions should promote an effective use of land in meeting the need for homes and other uses and in a way that makes as much use as possible of previously-developed or brownfield land.
- 2.19 Paragraph 145 states that there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. 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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
- 2.20 Paragraph 146 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
- a) makes as much use as possible of suitable brownfield sites and underutilised land;
  - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
  - c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

- 2.21 Paragraph 147 states, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 2.22 Paragraph 148 states that 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;
  - 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.

### **Planning Practice Guidance**

- 2.23 The National PPG on plan making states that plans set out a vision and framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places (paragraph 001).
- 2.24 The Guidance sets out that housing need is “an unconstrained assessment of the number of homes needed in an area” and should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.
- 2.25 Paragraph 010 states that the standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. There may be circumstances to consider whether actual

housing need is higher than the standard method indicates. The PPG identifies circumstances where this may be appropriate (but not limited to) which include:

- Growth strategies for the area that are likely to be deliverable;
- Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

2.26 Authorities must therefore prepare local plans by assessing future needs and opportunities for their areas, exploring and identifying options for addressing these needs, and setting out a preferred approach to delivering for these identified needs. The PPG advises that the process should involve gathering evidence, carrying out a sustainability appraisal, and effective engagement and consultation with local communities, businesses and other interested parties (paragraph 034). In this way, the Local Plan should be able to show how the presumption in favour of sustainable development will be applied locally (paragraph 036).

### **Local Policy Context**

#### **Newcastle-under-Lyme Corporate Plan 2022 to 2026**

2.27 The Council's Corporate Plan, approved in 2022 sets out a vision and strategic priorities to guide the work of the Council and its investment priorities.

2.28 The Corporate Plan sets a vision for the borough where people have good jobs, live in vibrant communities, and receive quality services. This includes the provision of new homes in the right places to meet peoples needs. The strategic priority areas are as follows:

- 1. One Council delivering for local people** – a council that listens to local residents and communities and is responsive to their needs. We will work with them to deliver first-class efficient services while keeping Council tax low.
- 2. A successful and sustainable growing borough** – building a strong and sustainable economy to ensure opportunities and support are available to everyone to improve their lives.
- 3. Healthy, active and safe communities** – ensuring everyone enjoys a safe environment and access to a wide range of facilities and activities to support and improve their health and quality of life.
- 4. Town centres for all** – transforming Newcastle and Kidsgrove town centres to ensure their future as places to live, work, shop, study and spend leisure time.

2.29 The Corporate Plan vision and strategic priorities are embedded within the Local Plan 2020 – 2040. In delivering the Corporate Plan priorities the Council



is committed to delivering the Newcastle Local Plan to support the sustainable development of our towns and villages.

### **Net Zero and Biodiversity Strategy Action Plan / Climate Adaptation and Resilience Strategy**

- 2.30 Climate change is one of the greatest challenges which we face. The Government has set a statutory target for the country to achieve net zero carbon emissions by 2050. Reflecting this, the Council has declared a climate emergency and approved strategies relating to climate change and biodiversity. The strategy sets out how the council will become a carbon neutral organisation and also work with local communities to help them decarbonise. The Local Plan 2040 is addressing and countering our changing climate through minimising the impact of new development and adaptation / mitigation through planning policies.

### **Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (2009)**

- 2.31 The Council adopted a joint local plan with Stoke-on-Trent in 2009 for the period 2009 to 2026. The spatial strategy set out in the adopted Local Plan seeks to guide the location of development and growth to support the principle of sustainable development. Section 5 of the adopted Local Plan outlines the overall spatial strategy for the former plan area and the spatial principles underpinning the strategy. Overall, the local plan spatial strategy seeks to meet the needs of Newcastle-under-Lyme and Stoke-on-Trent in ways that protect and sustain the environment. These local needs will require a careful balance of growth, change and restraint to secure environmental protection and promote regeneration of the inner urban core of the conurbation.
- 2.32 The adopted Local Plan sets out a spatial strategy for the six distinct sub areas which include:
- City Centre of Stoke-on-Trent
  - Stoke-on-Trent Inner Urban Core
  - Stoke-on-Trent Outer Urban Area
  - Newcastle Town Centre
  - Newcastle and Kidsgrove Urban Neighbourhoods
  - Newcastle Rural Areas

### **Joint Local Plan Preparation**

- 2.33 Between 2013 and 2020, the Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan. Whilst the joint Local Plan has no status, some of the evidence base used to inform the draft Plan contains important, relevant information to the two areas that has informed preparation of the Newcastle-under-Lyme Local Plan.

### **Neighbourhood Plans**

- 2.34 Neighbourhood Plans are prepared by the community, typically on a parish basis, setting out local planning policies, as well as potentially identifying sites for new development. Once 'made' they become part of the statutory development plan for the area. There are 'made' neighbourhood plans in the borough and others at varying stages in the process. Housing land supply from 'Made' Neighbourhood Plans in the borough is small scale and contributes to localised housing need. Once Neighbourhood Plans are 'Made' housing supply from these plans will contribute towards the local plan housing requirement and maintaining a 5-year housing land supply. However, the Newcastle-under-Lyme Local Plan does not rely on housing supply from Neighbourhood Plans to meet the housing requirement for the borough.
- 2.35 The 'Made' Neighbourhood Development Plans in the Borough are currently:
- Loggerheads Neighbourhood Plan (2019)
  - Chapel and Hill, Chorlton, Maer and Aston and Whitmore Neighbourhood Plan (2020)
  - Betley, Balterley and Wrinehill Neighbourhood Plan (2022)
  - Madeley Neighbourhood Plan (2022)
- 2.36 There are also a number of emerging Neighbourhood Development Plans in the Borough, including communities at Audley, Silverdale and Keele (as examples).

### **3 Effective Co-operation**

- 3.1 As part of the preparation of the Local Plan, the Council has liaised with neighbouring authorities regarding strategic cross-boundary matters. Duty to Co-operate discussions have been progressed with the following councils:
- Stoke-on-Trent City Council
  - Cheshire East Council
  - Stafford Borough Council
  - Staffordshire Moorlands District Council
  - Shropshire Council
- 3.2 This section of the topic paper sets out the emerging position with neighbouring authorities regarding strategic cross border matters including housing and employment land delivery and provision for Gypsy and Travellers and Travelling Showpeople. This should be read alongside the Regulation 19 Duty to Co-operate Compliance Statement (ED025).
- 3.3 The emerging position with neighbouring authorities on strategic cross border matters following ongoing discussions and the preparation of draft officer level SOCGs is set out below for each neighbouring authority in turn.

#### **Stoke-on-Trent City Council**

##### **Development Plan**

- 3.4 The Newcastle-under-Lyme and Stoke-on-Trent City Council Core Spatial Strategy (2009) forms the current development plan and sets out the broad planning policy framework for the two areas.

##### **Plan Making Stage**

- 3.5 Between 2013 and 2020, Newcastle-under-Lyme Borough Council worked jointly with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken in January 2021 to withdraw from the joint Plan and prepare a new Local Plan for Newcastle-under-Lyme. Stoke-on-Trent City Council are anticipated to undertake Regulation 18 consultation in autumn 2025, Regulation 19 consultation in spring 2026 and submission in autumn 2026.

##### **Unmet Housing Need**

- 3.6 Stoke-on-Trent City Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state that it is unable to accommodate unmet housing need from Newcastle-under-Lyme. Stoke-on-Trent City Council is identified in the NPPF and PPG as one of the cities where the standard method calculation of LHN includes an uplift of 35%. In providing for LHN based on the cities uplift and in view of Green Belt constraints, the council has stated that there is insufficient housing land supply to provide for any unmet housing need from Newcastle-under-Lyme Borough. Stoke-on-Trent City Council at the time of drafting this report has not

made a request for Newcastle-under-Lyme Borough Council to accommodate any unmet housing need in relation to the preparation of their new local plan.

### **Statement of Common Ground**

- 3.7 A bilateral officer level draft Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council. This follows a formal SOCG signed in 2022. Due to the early stage in the preparation of the Stoke-on-Trent City Council Local Plan the SOCG mainly concentrates on issues relevant to the Newcastle-under-Lyme Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Stoke-on-Trent City Council Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

### **Strategic Matters and Draft Record of Agreement**

- 3.8 The following key matters are agreed in relation to housing, employment and gypsy and travellers:

#### **Housing**

- Newcastle-under-Lyme Borough and Stoke-on-Trent City Council share the same housing market area (HMA).
- Stoke-on-Trent City Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- Stoke-on-Trent City Council, at the time of drafting this report, has not made a request to Newcastle-under-Lyme to accommodate any unmet housing need.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

#### **Employment Land**

- Newcastle-under-Lyme Borough and Stoke-on-Trent City Council share the same functional economic market area (FEMA).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

#### **Gypsies and Travellers / Travelling Showpeople**

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

#### **Green Belt**

- The councils agree that any amendments to the north Staffordshire Green Belt through the preparation of the respective local plans will not result in the coalescence of settlements between the two authority areas.

## **Cheshire East Council**

### **Development Plan**

- 3.9 The Cheshire East Local Plan Strategy (2017) and Site Allocations and Development Policies Document (2022) form the Development Plan for the Cheshire East Borough.

### **Plan Making Stage**

- 3.10 The Council have recently commenced preparation of a new style local plan prepared under the government's proposed reforms to the planning system. As a first step in the preparation of a new local plan the council consulted on an 'issues paper' from the 8<sup>th</sup> of April to 1<sup>st</sup> July 2024 to scope the issues that local plan should consider. The local development scheme anticipates that the local plan will be adopted in 2028.

### **Unmet Housing Need**

- 3.11 Cheshire East has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state that it is unable to accommodate any unmet housing need from Newcastle-under-Lyme. Firstly, they have stated that as Cheshire East is within a different housing market area (HMA) accommodating any unmet housing need would not address housing needs within the Newcastle-under-Lyme HMA. Secondly, due to the early stage in review of the Cheshire East Local Plan the council has stated that it is not in a position to confirm any ability to meet unmet housing need. Cheshire East has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their new local plan.

### **Statement of Common Ground**

- 3.12 A officer level draft bilateral Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Cheshire East Borough Council. Due to the early stage in the preparation of the Cheshire East Local Plan the SOCG mainly concentrates on issues relevant to the Newcastle-under-Lyme Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Cheshire East Council Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

### **Strategic Matters and Draft Record of Agreement**

- 3.13 The following key matters are agreed in relation to housing, employment and gypsy and travellers:

#### **Housing**

- The boroughs of Newcastle-under-Lyme and Cheshire East are located within separate housing market areas (HMAs).

- Cheshire East Borough Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- Cheshire East Borough Council has not made a request to Newcastle-under-Lyme to accommodate unmet housing need.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

### **Employment Land**

- The boroughs of Newcastle-under-Lyme and Cheshire East are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

### **Gypsies and Travellers / Travelling Showpeople**

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

### **Stafford Borough Council**

#### **Development Plan**

- 3.14 The development plan for Stafford comprises the adopted local plan (2014).

#### **Plan Making Stage**

- 3.15 Stafford completed consultation on their Regulation 18 local plan document in December 2022. The Council is in the process of revising its local development scheme which will confirm their approach to local plan preparation and associated timetable.

#### **Unmet Housing Need**

Stafford Borough Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state it is unable to accommodate unmet housing need from Newcastle-under-Lyme. Stafford Borough is located within a different housing market area (HMA) and the accommodation of unmet housing need would not address housing needs within the Newcastle-under-Lyme HMA. Stafford Borough Council has also not made a request to Newcastle-under-Lyme Borough Council to accommodate any potential unmet housing need related to the preparation of their new local plan.

#### **Statement of Common Ground**

- 3.16 A bilateral officer level draft Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Stafford Borough Council. Stafford is at a different stage in the plan making. Therefore, the SOCG mainly concentrates on issues relevant to the Newcastle-under-Lyme

Local Plan. A separate SOCG may be prepared regarding the issues relevant to the Stafford Borough Council Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

### **Strategic Matters and Draft Record of Agreement**

- 3.17 The following key matters are agreed in relation to housing, employment and gypsy and travellers:

#### **Housing**

- The boroughs of Newcastle-under-Lyme and Stafford are located within separate housing market areas (HMAs).
- Stafford Borough Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.
- Stafford Borough Council has not made a request to Newcastle-under-Lyme to accommodate unmet housing need.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

#### **Employment Land**

- The boroughs of Newcastle-under-Lyme and Stafford are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

#### **Gypsies and Travellers / Travelling Showpeople**

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

### **Staffordshire Moorlands District Council**

#### **Development Plan**

- 3.18 The development plan comprises the Staffordshire Moorlands Local Plan adopted in 2020 which sets out the vision and spatial strategy for the district to 2033.

#### **Plan Making Stage**

- 3.19 The Council's published local development scheme anticipates a review of the adopted local plan will be undertaken in 2025. Following this assessment if an update to the local plan is required, it is anticipated the plan will be adopted in the summer of 2028.

#### **Unmet Housing Need**

- 3.20 Staffordshire Moorlands Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough to state it is

unable to accommodate any unmet housing need. Staffordshire Moorlands has stated that this matter can only be considered in detail following commencement of their own local plan review in 2025. Due to the timing of this review and the advanced stage of the Newcastle-under-Lyme local plan the council is unable to consider the accommodation of any unmet housing need at this time. Staffordshire Moorlands has also not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing need related to the preparation of their local plan.

### **Statement of Common Ground**

- 3.21 A bilateral officer level draft Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Staffordshire Moorlands District Council. Due to the fact that the council has not yet commenced a review of their local plan the SOCG and duty to co-operate matters are currently mainly concentrated on the Newcastle-under-Lyme local plan. A separate SOCG may be prepared regarding the issues relevant to the Staffordshire Moorlands Local Plan at an appropriate time in its preparation process. Duty-to-Co-operate discussions will continue regarding cross boundary matters as both Local Plans progress.

### **Strategic Matters and Draft Record of Agreement**

- 3.22 The following key matters are agreed in relation to housing, employment and gypsy and travellers:

#### **Housing**

- The Borough of Newcastle-under-Lyme and Staffordshire Moorlands District are located within separate housing market areas (HMAs).
- Staffordshire Moorlands Council has confirmed it is not able to accommodate unmet housing need from Newcastle-under-Lyme.
- Staffordshire Moorlands Council has not made a request to Newcastle-under-Lyme to accommodate any potential unmet housing.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

#### **Employment Land**

- The Borough of Newcastle-under-Lyme and Staffordshire Moorlands District are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

#### **Gypsies and Travellers / Travelling Showpeople**

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.



## **Shropshire Council**

### **Development Plan / Plan Making Stage**

- 3.23 The Shropshire Local Plan is currently at Examination with adoption anticipated in 2024. Once adopted, the new local plan will comprise the development plan for the area.

### **Unmet Housing Need**

- 3.24 Shropshire Council has responded to a formal written request and ongoing discussions with Newcastle-under-Lyme Borough Council to state they are unable to accommodate any unmet housing need. They have stated that due to the advanced stage in the preparation of their local plan they are unable to consider accommodating any unmet housing need. They have also stated that in accommodating any unmet need it would lead to an unsustainable pattern of development. It is also noted that Shropshire Council is located within a different HMA.
- 3.25 As part of the preparation of the new Shropshire Local Plan a request was made to Newcastle-under-Lyme to accommodate a proportion of unmet housing need in 2020. Newcastle-under-Lyme responded to confirm it was unable to accommodate any unmet housing need. The need relates to a different HMA and through the preparation of the Newcastle-under-Lyme local plan the council has its own challenges in providing for local housing need which requires Green Belt release. Shropshire Council intends to meet their identified LHN within their local authority area through their new local plan and there is no outstanding request for Newcastle-under-Lyme to accommodate any unmet housing need.

### **Statement of Common Ground**

- 3.26 A bilateral officer level draft Statement of Common Ground has been prepared between Newcastle-under-Lyme Borough Council and Shropshire Council. An SOCG was signed between the councils regarding matters associated with the Shropshire Local Plan. A further SOCG has now been prepared that primarily focuses on the Newcastle-under-Lyme Local Plan due to the difference in stages of the respective local plans. Duty-to-Co-operate discussions will continue between the councils as appropriate.

### **Strategic Matters and Draft Record of Agreement**

- 3.27 The following key matters are agreed in relation to housing, employment and gypsy and travellers:

#### **Housing**

- The borough of Newcastle-under-Lyme and Shropshire Council are located within separate housing market areas (HMAs).
- Shropshire Council has confirmed it is unable to accommodate unmet housing need from Newcastle-under-Lyme Borough Council.

- There is no outstanding request for Newcastle-under-Lyme to accommodate any unmet housing need from Shropshire. Shropshire Council proposes to meet its local housing need in full through their new local plan.
- The councils agree that Newcastle-under-Lyme will provide for its own housing requirement through preparation of its local plan.

### **Employment Land**

- The borough of Newcastle-under-Lyme and Shropshire Council are located within separate functional economic market areas (FEMAs).
- The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

### **Gypsies and Travellers / Travelling Showpeople**

- The councils agree that each council will provide for its own identified accommodation needs for Gypsy and Traveller and Travelling Showpeople.

### **Conclusions for the Spatial Strategy**

- 3.28 As a result of duty to co-operate discussions and preparation of officer level draft SOCGs to the Regulation 19 stage there has been no request from neighbouring authorities for Newcastle-under-Lyme to accommodate any unmet need for housing, Gypsies and Travellers / Travelling Showpeople or employment land. Furthermore, it has been established that neighbouring authorities are unable to accommodate any unmet need from Newcastle-under-Lyme Borough.
- 3.29 The Newcastle-under-Lyme local plan spatial strategy includes the allocation of strategic employment sites in the Green Belt which contribute to local needs and wider economic growth (including growth of key sectors) in the West Midlands sub-region. The local plan allocation of strategic employment sites has been discussed with neighbouring authorities.
- 3.30 The Council will continue to work closely with neighbouring authorities on cross boundary strategic matters including housing and employment delivery. Where appropriate this will include ongoing preparation of bilateral statements of common ground dealing with cross border strategic matters.
- 3.31 The Newcastle-under-Lyme local plan spatial strategy will provide for the objectively assessed housing needs for the Borough as established through the councils housing and economic needs assessment (HENA, 2024).

## 4 Relevant Evidence

### Introduction

- 4.1 The following key evidence studies have informed the local plan spatial strategy for housing including strategic factors such as objectively assessed needs for housing and employment. In terms of 'bottom up' factors the SHELAA is identified as a key source of sites in addition to sites submitted through the local plan consultation stages.

#### **Newcastle-under-Lyme Housing and Economic Needs Assessment (2023 and 2024 update)<sup>1</sup>**

- 4.2 A key element of the evidence base for the Local Plan is the Borough's Housing and Economic Needs Assessment (HENA) (2023 & 2024 update). The HENA has been produced by Turley on behalf of Newcastle-under-Lyme Borough Council. This study provides an update to the HENA that was jointly prepared with Stoke-on-Trent City Council in 2020. The updated study takes account of newly available data in relation to objectively assessed needs for housing and employment land in Newcastle-under-Lyme. The HENA sets out overall housing need as well as looking at affordable housing need, in the context of national policy. The study also looks at the needs from a range of specific groups in the population, including older persons.
- 4.3 The HENA provides a local housing needs assessment for Newcastle-under-Lyme Borough, which has been calculated using the approach set out in the NPPF, and in accordance with the 'standard method'. The local housing needs figure for Newcastle-under-Lyme is 347 homes per annum which equates to 6,940 dwellings over the plan period 2020 – 2040 (with a base date of March 2023).
- 4.4 In accordance with NPPF paragraph 61, the standard method is the advisory starting point for establishing the housing requirement for the plan area. The NPPF states that, *"There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals"*. The Planning Practice Guidance (PPG) also sets out circumstances where it may be appropriate to consider whether actual housing need is higher than the standard method indicates. This includes in relation to *"growth strategies for an area that are likely to be deliverable"*.
- 4.5 In accordance with the NPPF and PPG, the HENA update has considered if there are circumstances which justify setting the local plan housing requirement above LHN (as derived from the standard method). In relation to the local plan economic strategy (and associated population and jobs growth), projected employment land requirements and strategy for the delivery of

---

<sup>1</sup> <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base>

strategic employment sites, there is justification in setting the housing requirement above LHN.

- 4.6 The HENA identifies that housing growth of 347 dwellings per annum (in accordance with the standard method) would increase the Borough's population by around 4% over the plan period with very limited growth in the working age population aged 16-64. This level of growth is projected to support around 167 jobs per annum in Newcastle-under-Lyme between 2023 and 2040 which does not align with economic and employment growth forecasts for the plan period to 2040.
- 4.7 The HENA update examines the latest Cambridge Econometrics (March 2023) and Experian (December 2023) economic forecasts for Newcastle-under-Lyme for the period 2023-2040. In assessing these growth projections more weight has been applied to the Experian forecast which is more consistent with past economic trends. The Cambridge Econometrics forecast is considered more volatile and departs significantly from previous historic trends identifying significant growth in accommodation and food services, government services and distribution despite none of these sectors experiencing growth over the last 5 years. Therefore, a midpoint employment projection has been established of **237 jobs per annum** which (while taking account of the CE forecast), aligns more closely with the Experian forecast. In order to support growth of 237 jobs per annum housing growth of **400 dwellings per annum** would be required.
- 4.8 The HENA also considers the impact on jobs growth of the proposed strategic local plan employment allocations and how this relates to the baseline economic growth forecast and in turn, housing need. It is considered that the allocation of the proposed strategic employment sites in the local plan does not result in a level of job growth during the plan period that would require delivery in excess of 400 dwellings per annum. Overall employment land supply is depleting, and supply delivered on strategic sites over the plan period will contribute to local need and demand from the baseline.
- 4.9 Overall, the HENA identifies a projected employment land requirement of a minimum of 63 hectares over the plan period 2020 – 2040. This is balanced against an existing employment land supply as of March 2023 which necessitates a need for new employment allocations in the local plan.

#### **Strategic Green Belt Study (Parts 1 – 3, 2017 – 2023)**

- 4.10 A strategic Green Belt Study has been undertaken by Arup on behalf of Newcastle-under-Lyme and Stoke-on-Trent City Council. The study was initially commissioned to inform preparation of a joint local plan and is now informing preparation of the respective local plans for Newcastle-under-Lyme and Stoke-on-Trent City Council.
- 4.11 The Green Belt Study has informed the local plan spatial strategy through:

- Undertaking an assessment of the Newcastle-under Lyme and Stoke-on Trent Green Belt against the Green Belt Purposes set out in the NPPF (paragraph 143).
- Alongside other evidence informing the identification of a shortlist of sites for potential allocation in the Newcastle-under-Lyme Local Plan.
- Assessing the impact of sites proposed for allocation in the Green Belt.
- Assessing appropriate Green Belt boundaries for the Local Plan to consider, where an allocation is justified.
- Reviewing the requirement for safeguarded land between the urban area and the Green Belt, in accordance with NPPF paragraph 148.
- Reviewing the Exceptional Circumstances (in relation to NPPF requirements) case for amending the Green Belt to provide for objectively assessed needs for housing and employment. This includes the examination of reasonable alternative options to Green Belt release.

4.12 The Study was undertaken in 3 parts as follows which are discussed further below in respect of scope, outputs and implications for the spatial strategy.

#### **Green Belt Assessment Part 1 (2017)<sup>2</sup>**

- 4.13 Part 1 provided an assessment of how the Newcastle-under-Lyme and Stoke-on-Trent Green Belt contributes to the five purposes of Green Belt set out in the NPPF. The methodology undertaken for this study was informed by national policy and the approach to Green Belt assessments undertaken by neighbouring authorities.
- 4.14 Stage 1 of the assessment involved dividing the whole Green Belt in Newcastle-under-Lyme and Stoke-on-Trent into general areas. These areas have been assessed against the five Green Belt purposes set out in the NPPF. This assessment informed the identification of smaller Green Belt parcels for further assessment as part of Stage 2.
- 4.15 Stage 2 involved defining smaller Green Belt parcels adjacent to the urban areas and inset settlements (forming part of the 'General Areas') assessed as making a 'moderate' or 'weak' contribution to the Green Belt. These parcels were assessed against the five Green Belt purposes applying the same methodology as for Stage 1.
- 4.16 This two-stage process enabled the whole of the Green Belt to be assessed against the Green Belt purposes and the performance of smaller parcels to be assessed in more detail where required (through identification of the smaller Stage 2 parcels).
- 4.17 The Part 1 Green Belt assessment, alongside other evidence, has informed decision-making regarding site selection and potential options for Green Belt release following the consideration of reasonable alternative options as required in national policy.

---

<sup>2</sup> <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base>

### **Green Belt Assessment Part 2 (2020)**

- 4.18 The second part to the study provided an assessment of the shortlist of Green Belt sites being considered for potential release in Newcastle-under-Lyme and Stoke-on-Trent local plan. This part of the study was originally prepared to inform a joint local plan but has subsequently informed the preparation of separate local plans for each Council.
- 4.19 A shortlist of sites for assessment in this study was established through the following site selection stages undertaken by the Council:
1. **Strategic Housing Land Availability Assessment (SHLAA), Employment Land Review (ELR)** – Assessment of sites in relation to suitability, availability and achievability.
  2. **Constraints Assessment** – Assessment of sites against constraints that would affect deliverability e.g. ecology, flood risk.
  3. **Strategic Factors** – Assessment of sites against Local Plan strategic objectives and settlement hierarchy.
- 4.20 This site selection process identified a shortlist of 71 sites in Newcastle-under-Lyme. A Green Belt assessment of these sites was undertaken using the same methodology as the Part 1 Study (2017). The assessment identified those sites with weak to moderate performance against the Green Belt purposes to inform the councils consideration of sites for potential release from the Green Belt.

### **Green Belt Assessment Part 3 (2023)**

- 4.21 This stage of the study was prepared to inform preparation of the Newcastle-under-Lyme Regulation 18 Local Plan which was consulted on in the summer of 2023. The study included the following elements:
1. Advice on safeguarded land as set out in paragraph 148 of the National Planning Policy Framework (2023) ('the NPPF'), including a recommended approach to determine whether it is necessary and how to determine the quantum and location of safeguarded land.
  2. Advice on compensatory improvements to the Green Belt as required by paragraph 150 of the NPPF including a recommended approach.
  3. An assessment of additional sites considered by the Council for potential allocation in the Green Belt.
  4. Advice on exceptional circumstances as required by paragraph 145 of the NPPF – updating the 'Exceptional Circumstances Review' (November 2019) undertaken as part of the Green Belt Part 2 study.

### **Green Belt Review Consolidated Report (July 2024)**

- 4.22 The purpose of this report being to:
- Review the previously agreed methodology (in Part 2) to ensure that the method remains robust and relevant against any changes to national policy, guidance and case law since the method was established.

- Undertake a number of additional Green Belt assessments (this includes new sites, previously assessed sites with revised boundaries, and previously assessed sites where circumstances have changed).
- Consolidate all of the previous Green Belt site review assessments to ensure they are all in one place and can be easily located and viewed. This report therefore supersedes the previous Green Belt Site Review document from the Green Belt Assessment Part 2 and Section 5 of the Green Belt Review Part 3. The assessments have been directly copied across into this report and no changes have been made to them apart from where an error has been identified and has been corrected.

### **Safeguarded Land**

- 4.23 A study<sup>3</sup> was undertaken on behalf of the Council by Arup to assess the need for safeguarded land. This Study should be read alongside Part 3 of the Green Belt Review undertaken by Arup which also provided advice on this matter. The Green Belt Review (Part 3) 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 as follows:
- **Stage 1 Requirement:** Determine whether it is 'necessary' to identify safeguarded land by assessing the likely scale of brownfield land and considering whether windfall sites are a reliable source of supply,
  - **Stage 2 Quantum:** Project forward current development needs for a specified duration,
  - **Stage 3 Location:** In order to identify which sites should be safeguarded, apply the site selection process, considering all relevant evidence including the Green Belt Review, SA, and the overall spatial strategy.
- 4.24 In relation to Stage 1 the Arup study concludes that further Green Belt release may be required to meet local housing needs beyond the end of the plan period. In relation to employment land and the proposed allocation of two strategic sites, supply may endure beyond the plan period and there is also significant uncertainty in robustly establishing what employment land needs will be post 2040. On this basis Arup recommends that there is no need to safeguard land between the urban area and the Green Belt for employment.
- 4.25 Stage 2 of the Arup study examines the potential quantum of safeguarded land based on the current assessment of local housing need. The study concludes that if the council decided to safeguard land for housing there may be a need to provide for a 5-to-7.5-year supply of housing land which would deliver between 1,562 to 2,342 dwellings.

---

<sup>3</sup> Green Belt Safeguarded Land Advice (Assessing the need for Safeguarded Land) Arup, May 2024

- 4.26 The Arup study has also examined a range of further additional factors to consider informing the council's decision regarding whether to safeguard land in the local plan. This has included consideration of national policy uncertainty, determining development needs beyond the plan period, housing and employment land supply, safeguarded land exceptional circumstances, housing and employment site options and the likely timing of a local plan review.
- 4.27 The Council has decided that it is not appropriate to safeguard land in the local plan between the urban area and the Green Belt for housing or employment for the following reasons:
- a) There is significant uncertainty at a national level which presents difficulties in robustly establishing housing and employment needs beyond the end of the plan period to inform safeguarded land requirements.
  - b) In accordance with national policy, there needs to be a robust exceptional circumstances case to amend the Green Belt to provide for safeguarded land. Given the significant uncertainty in establishing housing and employment needs beyond the end of the plan period, the council considers that there is not an exceptional circumstances case.
  - c) The local plan proposes a degree of flexibility with the provision of a 10% housing supply buffer. It is considered that this flexibility in housing supply will contribute to needs beyond the end of the plan period.
  - d) The proposed spatial strategy for employment includes a supply which will contribute to needs beyond the end of the plan period. Therefore, there is no need to safeguarded land for employment.
  - e) In relation to housing site options there are insufficient available Green Belt options to 'safeguard' to provide 5 – 10 years housing land supply beyond the plan period.
  - f) Reforms are anticipated to the planning system including in relation to plan making which may require an early review of the local plan. On this basis the spatial strategy may need to be reviewed in the short term in a different legislative context. Therefore, the requirement for safeguarded land is uncertain.
- 4.28 The matter of safeguarded land is discussed further in Section 5 in the context of establishing the local plan spatial strategy.

#### **Compensatory Improvements to Green Belt**

- 4.29 The study identified that policies for compensatory improvements to the Green Belt in relation to environmental quality and accessibility of the remaining Green Belt will be required in relation to preferred sites proposed for release from the Green Belt.
- 4.30 Types of improvements that may be required are site specific but may include improvements to biodiversity, woodland planting, habitat creation, enhanced walking and cycling routes, improved public access, improved recreational facilities and/or landscape enhancements.



- 4.31 Improvements to land adjacent or near to the site should be pursued in the first instance. If this is not possible financial contributions could then be used for Council-led projects in the Green Belt, or on designated sites such as Parks, Nature Improvement Areas, Local Wildlife Sites, Local Nature Reserves located within the Green Belt, or other non-designated sites in the Green Belt.

#### **Exceptional Circumstances Review**

- 4.32 The Green Belt Study included a review of the exceptional circumstances case for amending the Green Belt through the preparation of the Local Plan. This has informed the case presented in Section 5 of this topic paper.

#### **Strategic Housing and Economic Land Availability Assessment (SHELAA)**

- 4.33 A Strategic Housing Land and Economic Land Availability Assessment (SHELAA) for Newcastle-under-Lyme was published in 2024. It sets out all the sites that have been promoted and identified for potential future development. This evidence has helped the council to identify what land in the borough is available to deliver housing, supporting infrastructure and economic development. It provides an indication of capacity to inform the housing land supply and forms part of the local evidence base for the local plan.
- 4.34 The assessment of sites in the SHELAA and those submitted through the local plan consultation stages is the starting point (in addition to existing housing supply) to identify sufficient provision to meet the housing requirement and in accordance with the emerging spatial strategy.

#### **Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Centre Regeneration Study (2023)**

- 4.35 In establishing the local plan spatial strategy and preferred distribution of development, it is important that the most use is made of suitable brownfield sites and underutilised land within the existing urban area. Through the process of preparing the SHELAA and urban capacity study all reasonable housing options have been considered in the main settlements of Newcastle-under-Lyme town and Kidsgrove. This ensures that in meeting providing for local housing needs all reasonable alternative brownfield options have been considered prior to Green Belt release.
- 4.36 Turley and Aspinall Verdi were commissioned by the council to prepare an assessment and analysis of the potential for additional urban capacity (beyond that identified in the SHELAA) within the town centres of Newcastle-under-Lyme and Kidsgrove. The study also considers the council's ongoing programme of regeneration and investment in the town centres and associates sites that have the potential to come forward for development during the plan period.
- 4.37 Within the town centres of Newcastle-under-Lyme the urban capacity study identified sites over and above the SHELAA from the following sources:

- Vacant land or land in active use but undeveloped e.g. car parking and in Council ownership;
- Vacant land or land in active use but undeveloped which was previously in Council ownership; and
- Sites in Council ownership which are currently developed but where there are plans to demolish existing uses;
- Sites with existing development in active use and not in Council ownership; and
- Existing buildings with upper floor uses which are considered to more readily offer the potential for conversion / change of use to residential uses.

4.38 The study identifies specific sites within Newcastle-under-Lyme and Kidsgrove town centres (over and above those in the SHELAA) that are potentially suitable for development. This process identified the following:

- 10 potential sites in Newcastle-under-Lyme town centres with a combined potential of 272 dwellings.
- 2 potential sites in Kidsgrove with a combined potential of 54 dwellings.

The outcomes of this study have informed the SHELAA and its outcomes.

### **Key Conclusions for the Spatial Strategy**

4.39 In relation to the strategic evidence studies prepared alongside the local plan the following conclusions can be made:

- **Housing Requirement:** In delivering the preferred economic growth scenario identified in the HENA there is a justified need to deliver a minimum of 8,000 homes (400 dwellings per annum) over the plan period to 2040. In accordance with national policy the local plan spatial strategy will need to identify sufficient housing supply to provide for the local plan housing requirement.
- **Employment Requirement:** The HENA (2024) provides a robust assessment of employment land requirements for the plan area to 2040. The study identifies an objectively assessed land requirement for the provision of a minimum of 63ha of employment land over the plan period to 2040. This quantum of employment development supports the housing and economic growth strategy.
- **Green Belt Exceptional Circumstances:** There is a compelling case to amend the Newcastle-under-Lyme Borough Green Belt to provide for local housing and employment needs derived from the HENA (2024). The council has comprehensively reviewed all reasonable alternative options to Green Belt release in accordance with national policy.

- **SHELAA / Urban Capacity Studies:** These studies have reviewed all sites that have been promoted for development and those identified by the Council. This is the starting point in establishing the (in addition to existing supply) to identify sufficient provision to meet the housing requirement and in accordance with the emerging spatial strategy.
- **Green Belt Study and Sites:** Alongside other evidence, the Green Belt study has informed the spatial strategy and the shortlist of sites for potential allocation in the local plan.
- **Safeguarded Land:** It is concluded that the local plan will not safeguard land between the urban area and the Green Belt for housing or employment.

## **5 Definition and Evolution of the Spatial Strategy**

### **Introduction**

- 5.1 This section sets out the process of how the local plan spatial strategy for housing has been defined and how this has evolved through the preparation of the local plan from Issues and Strategic Options (2022), The First Draft Local Plan (Regulation 18, 2023) and the Regulation 19 Local Plan (2024).

### **Housing Quantum**

- 5.2 This section of the topic paper sets out the process and options considered in establishing the local plan housing requirement. This includes consideration of national policy and guidance (NPPF, PPG), the evidence base, SA and responses received to local plan consultation stages. This includes the exploration of options for the Local Plan providing for a level of growth above or below LHN (derived from the standard method).

### **Background**

- 5.3 The NPPF sets out the key elements of plan making which includes establishing Local Housing Need (LHN), based on the Government's standard method and developing a policy response to meet those needs.
- 5.4 Paragraph 11 of the NPPF states that, 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.5 Paragraph 61 of the NPPF states that, '...strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 5.6 Paragraph 001 of the Planning Practice Guidance states that, 'Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many

homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.’

- 5.7 The following section sets out options for the Local Plan policy response to address LHN including options considered at previous consultation stages. This also includes consideration of an appropriate supply ‘buffer’ which aims to ensure that LHN can be met taking into account any unforeseen delivery risks.

#### **What is Newcastle-under-Lyme LHN?**

- 5.8 The Government’s standard method defines Newcastle-under-Lyme’s Local Housing Need (LHN) as 347 dwellings per annum (dpa) and 6,940 dwellings in total over the plan period (2020 – 2040) (as of the local plan base year, March 2023).

#### **Applying a housing land supply buffer**

- 5.9 It is common practice for local plans to identify a housing land supply buffer over and above the housing requirement. To give greater resilience in providing for the housing requirement the Council is proposing to identify a housing supply buffer. Over the plan period this will help to ensure that the housing requirement is delivered, and a 5-year land supply maintained taking account of issues such as any potential changes to the delivery trajectories of strategic sites. The scale of buffer has been identified with reference to approaches taken by other LPAs in recently adopted Local Plans. A buffer of around 10% above the housing requirement is considered appropriate in relation to local housing delivery rates and projected delivery rates from the mix of sites identified in the preferred spatial strategy.

#### **Should the housing requirement be set below LHN?**

- 5.10 Through the preparation of the local plan consideration has been given to reasonable alternative growth scenarios including the option of a growth scenario below LHN (derived from the standard method). This matter was first considered at Issues and Options Stage in 2022 and has been discounted as not a reasonable alternative option to pursue in the Plan.
- 5.11 The NPPF places emphasis on meeting objectively assessed housing needs subject to the provisions of paragraph 11 and strategic constraints identified in footnote 7 (including Green Belt). Green Belt currently limits growth around the main settlements in the borough. A local plan growth scenario without Green Belt release would deliver significantly below LHN and not provide for housing needs over the plan period.
- 5.12 The NPPF makes provision for local plans to amend the Green Belt subject to demonstrating exceptional circumstances. Exceptional circumstances in Newcastle-under-Lyme include the need to address local housing needs and achieve economic growth aspirations for the area (as evidenced through the HENA 2024). It has been demonstrated through the council’s evidence

including SHELAA and urban potential study that it is not possible to provide for LHN in the main settlements alone. Furthermore, it has been evidenced through the duty to co-operate process that neighbouring authorities are unable to accommodate any potential unmet housing need from Newcastle-under-Lyme. Therefore, to provide for LHN there is a need to review the Newcastle-under-Lyme Green Belt.

- 5.13 A growth scenario below LHN would also prejudice the ability to achieve the preferred economic growth scenario identified in the HENA (2024) and associated growth of 237 jobs per annum. Delivery of housing below LHN would result in very limited growth in the working age population aged 16-64 and significantly limit potential for sustainable economic growth in the borough. It is considered essential that the local plan provides for above LHN (derived from the standard) method to achieve sustainable economic growth and to align with economic and employment forecasts for the plan period to 2040.
- 5.14 Through strategic Green Belt release including sustainable urban extensions and effective utilisation of brownfield land within the existing urban area there is sufficient housing supply options to meet LHN. This includes housing supply options well related to the main settlements and not subject to additional strategic constraints affecting delivery (over and above Green Belt).
- 5.15 In accordance with national policy, the evidence base, SA and responses to local plan consultation stages there is an emphasis on meeting local housing need and achieving economic growth aspirations for the area. On this basis, it is not considered a reasonable option to pursue a growth option below LHN that would lead to unmet housing need and significantly limit economic growth of the area.

#### **Should the housing requirement be set above LHN?**

- 5.16 The Planning Practice Guidance on Housing and Economic Needs Assessments sets out the scenarios (para 10.) whereby there may be justification for setting the housing requirement above LHN which include where:
- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals).
  - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
  - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.
- 5.17 The PPG also identifies that affordable housing needs can be a consideration in potentially setting a housing requirement over LHN where the PPG states that, “An increase in the total housing figures included in the plan may need to be considered where it could help to deliver the required number of affordable

homes”. The potential scenarios for considering a housing requirement above LHN (as identified in the PPG) are set out below.

**Are there planned infrastructure improvements justifying a housing requirement above LHN?**

- 5.18 There are currently no strategic infrastructure improvements planned within the borough which would in themselves provide justification for a local plan housing requirement above LHN.

**Are affordable housing needs a justification for a housing requirement above LHN?**

- 5.19 It is important to consider local affordable housing needs and whether this is a factor (to be weighed in the balance) for setting the housing requirement above LHN. The PPG states that, “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”
- 5.20 There is a need to apply caution in terms of the relationship between affordable housing need and planned delivery. This is because many households identified as having a need will already be living in housing so providing an affordable option does not lead to an overall net increase in housing. It is also important to consider the role and contribution of the private rented sector towards meeting need for subsidised housing for rent. The private sector role in provision of subsidised housing for rent contributes to addressing the need and it is not necessary for the Plan to address absolute affordable need.
- 5.21 The HENA (2024) identifies a significant level of affordable housing need of 278 affordable dwellings per annum, but this is not expressed as a target. This is because the amount of affordable housing that can be delivered is limited by the amount that can be viably provided.
- 5.22 Setting a housing requirement above LHN to address absolute affordable housing need carries a significant risk of the local plan housing requirement not being provided for. In Newcastle-under-Lyme absolute affordable housing need is 80% of the current standard method derived LHN. The HENA does not identify a demand for this level of market housing. If the housing requirement was set at this level the limitations in demand for market housing would likely result in both the housing requirement and absolute affordable housing need not being provided for. This would result in application of the punitive measures set out in NPPF paragraph 11.
- 5.23 Therefore, due to limitations in viability and evidence from the latest HENA, it is not appropriate to set the local plan housing requirement at a level to provide for affordable housing need in full. However, the local plan proposes to set the housing requirement above LHN based on the preferred HENA economic growth scenario which will deliver a higher quantum of affordable housing in comparison to the standard method.

**Is there unmet housing need (from neighbouring authorities) justifying a housing requirement above LHN?**

- 5.24 In accordance with national policy and guidance, local plans should provide for objectively assessed needs for housing and other uses. This also includes working closely with neighbouring local authorities to address unmet housing needs which cannot be met within neighbouring areas.
- 5.25 Paragraph 11 of the NPPF states: “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.
- 5.26 Paragraph 010 of the PPG on Housing and Economic Needs Assessment also refers to circumstances where it may be appropriate to consider higher growth. Circumstances where this may be appropriate include but are not limited to situations where an authority may agree to take on unmet housing need from neighbouring authorities.
- 5.27 As part of the preparation of the Local Plan, the Council is liaising with neighbouring authorities regarding strategic cross-boundary matters including housing and employment delivery. Bilateral officer level draft statements of common ground SOCGs are being prepared with neighbouring authorities dealing with strategic cross border matters including housing need with the following councils:
- Stoke-on-Trent City Council
  - Cheshire East Council
  - Stafford Borough Council
  - Staffs Moorlands District Council
  - Shropshire Council
- 5.28 As a result of duty to co-operate discussions and preparation of SOCGs to the Regulation 19 stage there is no outstanding request from neighbouring authorities for Newcastle-under-Lyme to accommodate any unmet housing need. It is anticipated that the majority of housing need (when measured against the NPPF 2023 standard method) for the respective councils will be met through existing commitments including planning permissions, allocations in local plans / neighbourhood plans and through windfall.



**Is there a growth strategy justifying a housing requirement above LHN?**

- 5.29 As set out in Section 4 of this paper, in relation to the housing and economic development needs assessment (HENA 2023 / 2024) the Council considers that there is justification through a local growth strategy in setting the local plan housing requirement above LHN. This is consistent with the guidance set out in NPPF para 61 and PPG section 010 whereby an economic growth strategy can provide justification for setting a housing requirement above LHN.
- 5.30 The HENA identifies that housing growth of 347 dwellings per annum (in accordance with the standard method) would increase the Borough's population by around 4% over the plan period with very limited growth in the working age population aged 16-64. This level of growth is projected to support around 167 jobs per annum in Newcastle-under-Lyme between 2023 and 2040 which does not align with economic and employment growth forecasts for the plan period.
- 5.31 A preferred economic growth scenario has been identified based on consideration of the latest Cambridge Econometrics and Experian growth forecasts for Newcastle-under-Lyme for the period 2023-2040. To deliver this economic growth scenario and associated growth of 237 jobs per annum the HENA identifies a need for a minimum of 8,000 homes (400 dwellings per annum) in total over the plan period (2020 – 2040).

**Housing Quantum Options Considered at Previous Consultation Stages**

- 5.32 Through the preparation of the local plan at Issues and Options (2022) and Regulation 18 (2023) a range of options have been considered in relation to a housing requirement based on an economic growth scenario which are discussed further below.

**Issues and Options (2022)**

- 5.33 At this stage of the local plan the following housing growth options were considered:

1. Standard Method	350 dpa
2. Sustainable growth	410 dpa
3. Greater job growth	445 dpa

- 5.34 Following this consultation stage and in relation to the published HEDNA (2020) it was concluded that Option 1 - local housing need (standard method) would be taken forward delivering 350 homes per annum and 7,000 homes over the plan period 2020 – 2040. At this time Option 1 aligned with the Government's standard method, economic jobs forecasts and was considered the most deliverable option in terms of site opportunities.

### **Regulation 18 (June 2023)**

5.35 At this stage the local plan SA considered 3 potential housing growth options:

- |                                            |         |
|--------------------------------------------|---------|
| 1. Standard Method                         | 358 dpa |
| 2. Midpoint Economic Forecast (HENA 2023)  | 301dpa  |
| 3. Highest employment forecast (HENA 2023) | 369 dpa |

5.36 At the Regulation 18 stage Option 1 – local housing need (standard method) was taken forward delivering 358 homes per annum and 7,160 homes over the plan period 2020 – 2040. At this time Option 1 aligned with the Government’s standard method, economic jobs forecasts and was considered the most deliverable option in terms of site opportunities.

### **Conclusions on Housing Quantum**

5.37 Following the Regulation 18 consultation stage further consideration been given to the housing requirement in relation to responses received to the consultation, the updated evidence base (including the HENA 2024) and SA. To deliver the preferred economic growth scenario identified in the latest HENA (2024) there is a need to deliver a minimum of 8,000 homes (400 dwellings per annum) in total over the plan period to 2040. This growth scenario is also considered deliverable in terms of site opportunities and proposed site allocations at the Regulation 19 stage. In conclusion, the Council considers there is a compelling case to base the local plan housing requirement on the preferred HENA 2024 economic growth scenario which is also consistent with national policy and guidance.

### **Broad Distribution Factors**

5.38 Following assessment of housing quantum, consideration has been given to a range of high-level strategic factors that influence which broad areas of the plan area are more sustainable to accommodate growth. The key strategic factors that have influenced the broad locations for growth in the local plan are discussed in turn as follows.

### **Environmental Factors**

5.39 Newcastle-under-Lyme is not significantly affected by environmental constraints that would affect the delivery of the housing requirement.

### **Green Belt**

5.40 The Green Belt boundary in Newcastle-under-Lyme forms part of the wider North Staffordshire Green Belt. It covers the majority of the northern half of the authority area and is contiguous with the Green Belt in Stoke-on-Trent Council to the east, Cheshire East Council to the north and Stafford Council to the south.

5.41 The Newcastle-under-Lyme Green Belt is drawn tightly around the urban area of Newcastle and Kidsgrove marking a swathe of rural land around the urban area and many villages. The Green Belt encompasses a significant proportion

of the Borough's land area overall. The Green Belt designation is a very significant policy constraint to growth in the Borough and particularly constricts growth around the urban area and main settlements.

- 5.42 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open' the essential characteristics of Green Belts are their openness and their permanence.
- 5.43 In establishing the spatial strategy, the Council has examined all reasonable alternative options to Green Belt release in order to accommodate the local plan housing requirement.
- 5.44 Alternative options to Green Belt release have been thoroughly examined through the preparation of the plan in accordance with national policy. The following options have been assessed:
- The assessment of alternative brownfield and underutilised land options within settlement boundaries,
  - Optimising the development densities to ensure efficient use of land,
  - Assessing potential surplus open space to accommodate housing,
  - Review of alternative sites in the rural area,
  - Review of potential options to inset villages currently washed over with Green Belt and allocate sites,
  - Duty to Co-operate – Working with neighbouring authorities to assess the option of unmet housing need to be accommodated outside the Borough.
- 5.45 These alternative options have been assessed through the evidence base and through ongoing engagement with key stakeholders and neighbouring authorities. The Council has concluded that following assessment of these options there remains a need to amend the Green Belt to accommodate the housing requirement in full (including delivery of the preferred economic growth scenario identified in the HENA 2024 and associated employment growth). Further consideration of these options is set out below as part of the Exceptional Circumstances Case for amending the Green Belt.

#### **Exceptional Circumstances Case**

- 5.46 The NPPF requires local authorities to demonstrate exceptional circumstances for altering the Green Belt through the preparation of the Local Plan. Strategic Local Plan policies should establish the need for changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- 5.47 The Council has established an exceptional circumstances case for amending the Green Belt consistent with national policy (NPPF) through the process of preparing the local plan which includes the following elements:

#### **Strategic Factors**

- a) **Housing and Employment Requirement:** The housing requirement of a minimum of 8,000 homes (400 dwellings per annum) and employment land requirement of a minimum of 63 hectares over the plan period (2020 – 2040) has been confirmed through the Housing and Economic Needs Assessment (2024). To deliver objectively assessed needs for development there is a need to amend the existing borough Green Belt boundaries. The Strategic Housing and Employment Land Availability Assessment alongside the Site Selection Report has identified that there are insufficient sites within existing development boundaries to meet overall identified requirements through the Local Plan.
- b) **Green Belt Constraint on Growth:** Green Belt is constraining growth in the Borough, particularly around the urban area of Newcastle and Kidsgrove where there is very limited available land for development within the urban area. The housing and employment land requirement cannot be provided for without Green Belt release in Newcastle-under-Lyme Borough. This is evidenced by the Housing and Economic Needs Assessment (2024), the Strategic Housing and Employment land Assessment (2024), the Site Selection Report (2024) and the Sustainability Appraisal Report (2024). Without alterations to Green Belt boundaries, there could be consequences including:
- a. Demand for new housing outstripping supply, further increasing house prices and a lack of new affordable housing provision leading to residents being unable to stay in the area.
  - b. An increasingly ageing population as young people leave and an absolute reduction in the number of people of working age. Difficulty in attracting inward investment and economic growth. In areas of relatively unaffordable housing, employers have difficulty in recruiting to lower paid positions.
  - c. Increases in traffic and congestion as people unable to live close to their place of work are forced to travel longer distances for employment and the smaller working-age population living locally would also mean more people commuting in to the area.
  - d. A decline in the vibrancy and vitality of town centres and some local services and facilities becoming unviable.

The importance of allocating land to go some way to meeting the identified development needs, combined with the consequences for sustainable development of not doing so, constitutes the exceptional circumstances required to justify alteration of the existing detailed Green Belt boundaries, whilst maintaining the overall general extent of the Green Belt.

### **Alternative Options to Green Belt Release**

- a) **Brownfield and Underutilised Land** - The council has concluded that that reasonable alternatives options have been thoroughly examined and there remains a requirement to release Green Belt land to accommodate the local plan housing requirement. This is evidenced through the Strategic Housing and Employment land Assessment (2024), the

Newcastle-under-Lyme and Kidsgrove Urban Capacity Study and Town Centre Regeneration Study (2023), and the Site Selection Report (2024).

- b) **Optimising Development Densities** - Density assumptions have been considered on a site-by-site basis through the local plan site allocation process to ensure efficient use of land. This is evidenced through the Site Selection Topic Paper (2024) and associated technical assessments for individual sites proposed for allocation in the Local Plan. The Council has also set out a policy approach in the emerging Local Plan (Policy HOU2) regarding efficient use of land and recommended densities for settlements in the hierarchy.
- c) **Surplus open space** - The Newcastle-under-Lyme Open Space Strategy and the Green Infrastructure Strategy (April 2022) considered whether there is any surplus open space with the potential to accommodate development needs.
- d) **Alternative Sites in the rural area** - This has been assessed through the Rural Area Topic Paper (2024), the Site Selection Topic Paper (2024) and the Regulation 19 SA Report (2024). Potential sites in the rural area beyond the Green Belt and not well related to tier 1, 2 or 3 settlements (in the settlement hierarchy) do not provide sustainable options for growth. This is because these locations have limited key facilities (including community facilities, health services, public transport, shops and employment) and infrastructure to support growth. Significant growth in the rural area would not provide a sustainable pattern of growth.
- e) **Could any washed over villages be inset and if so, could sites be allocated within these villages?** As part of the Green Belt Review Part 2, a Green Belt Village Study (October 2019) was prepared which considered whether the villages of Keele and Whitmore should be recommended for inset within (excluded from) the Green Belt. The study recommended that Keele Village be considered for inset and Whitmore remains as a washed over village.
- f) **Can neighbouring authorities accommodate some of the identified needs?** – Section 3 of this paper sets out further detail regarding effective co-operation with neighbouring authorities as part of the Duty to Co-operate. Through engagement with neighbouring authorities, it has been established that neighbouring authorities are unable to accommodate unmet housing need from Newcastle-under-Lyme and this is evidenced through bilateral discussions and emerging statements of common ground.

## **Site Level Exceptional Circumstances**

### **Housing**

- a) A shortlist of potential allocation sites has been assessed through the Green Belt Study which alongside other technical evidence has informed identification of the proposed local plan allocation sites. In relation to Green Belt sites have been assessed against the following:
  - Performance of the site against Green Belt purposes.

- Impact of removing the site on the overall function and integrity of the Green Belt.
- Presence/creation of a recognisable and permanent boundary
- Proposed compensatory improvements to the remaining Green Belt.

This is evidenced through the site assessments undertaken through the Green Belt Study (Part 3). The Site Selection Topic Paper (2024) and SA also sets out the appraisal of the sites and rationale for sites included in the preferred spatial strategy in accordance with the site selection methodology and key evidence.

## **Employment**

- a) Keele University Growth Corridor** – The University Growth Corridor consisting of Keele University and Keele Science and Innovation Park is proposed for allocation in the local plan for housing and employment. The University is a major asset for the Borough and the strategic objectives in the draft Local Plan seek to enable the growth of the University. Green Belt release in the University Growth Corridor (Site KL15) will also support the growth of key knowledge-based sectors (of importance to economic growth in the borough and wider sub region) directly associated with the university. Further evidence of the exceptional circumstances case is set out in the Site Selection Paper, Strategic Employment Sites Report, site level Green Belt assessment (set out in Green Belt Study Part 4).
- b) Strategic Employment Site - Junction 16 of the M6:** the strategic employment site at Junction 16 of the M6 (currently Green Belt) provides a sub-regional logistics focused employment park to accommodate employment development to meet a sub-regionally identified logistics need and provide for alternative HGV parking, in line with evidenced requirements demonstrating the need for such provision. There is a strategic need for employment land in this location, close to the M6 and strategic road network, as well as a general lack of other suitable sites to meet the overall scale of new employment land needed in the borough. Therefore, there are site level exceptional circumstances to amend the Green Belt to accommodate this strategic employment site. Further evidence of the exceptional circumstances case is set out in the Site Selection Paper, Strategic Employment Sites Report, site level Green Belt assessment (set out in Green Belt Study Part 4).

## **Green Belt and Broad Distribution**

- 5.48 The NPPF also requires that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development are taken into account. This includes consideration of directing proportionate growth to urban areas, towns and villages in accordance with the settlement hierarchy and in consideration

of utilising previously developed land and land which is well served by public transport.

- 5.49 Consistent with national policy and principles of sustainable development it is appropriate to direct growth primarily to the main settlements of Newcastle-under-Lyme and Kidsgrove which are well served by a range of infrastructure, services, facilities and public transport. It is also appropriate to direct proportionate growth to the Rural Service Centres in the borough which benefit from key services, facilities and infrastructure to support growth.
- 5.50 The Green Belt Study undertaken by Arup on behalf of the Council has also informed the broad distribution of development. The Study divided the Green Belt adjoining Newcastle-under-Lyme and Stoke-on-Trent into general areas and smaller sub areas which were assessed against the Green Belt purposes set out in paragraph 143 of the NPPF. The performance of land parcels against the Green Belt purposes has informed the broad distribution of development alongside other strategic factors including settlement hierarchy. The study identifies land parcels which perform less well (moderate to weak) against the Green Belt purposes which alongside other evidence considerations has informed distribution.

#### **Distribution by Housing Market Area**

- 5.51 Newcastle-under-Lyme shares a housing market area (HMA) with Stoke-on-Trent City Council. Housing and Economic Development Needs assessments have been undertaken which provide assessments of local housing need for each council area. Through the preparation of the respective local plans housing needs for the overall HMA will be addressed.
- 5.52 National policy and the standard method provide the basis for establishing the minimum respective local housing need in Newcastle-under-Lyme and Stoke-on-Trent City Council. Through the preparation of the local plan the council has engaged on an ongoing basis with Stoke-on-Trent City Council as part of the Duty to Co-operate. Discussions have examined options for Stoke-on-Trent City Council to accommodate a proportion of Newcastle-under-Lyme's local housing need to reduce the need for Green Belt release. Stoke-on-Trent City Council have confirmed<sup>4</sup> they are unable to accommodate unmet housing need from Newcastle-under-Lyme in addition to accommodating their own housing need (which includes a 'cities' uplift to the standard method set out in NPPF paragraph 62).
- 5.53 Therefore, the quantum and distribution of housing taken forward in the respective local plans for Newcastle-under-Lyme and Stoke-on-Trent City Council remain in accordance with the assessments of local housing need undertaken for each council.

---

<sup>4</sup> As evidenced through a Statement of Common Ground.

### **Settlement Hierarchy**

- 5.54 The settlement hierarchy is a key strategic factor influencing the location of growth in the borough which is supported by responses received to the previous local plan consultation stages and through SA. A sustainable approach to distribution of development consistent with the NPPF is to concentrate growth primarily in the strategic centre of Newcastle-under-Lyme and the Urban Centre of Kidsgrove where there is good access to the widest range of services, facilities, employment and public transport.

### **Strategic Centres**

- 5.55 **Newcastle-under-Lyme** forms the strategic centre of the borough and contains the greatest range of services and facilities, retail, sport and leisure, economic and residential areas, sustainable transport connections and accessible public open space. The Newcastle-under-Lyme strategic centre represents the most sustainable location for growth and therefore is the primary focus for housing growth in the Borough.

### **Urban Centres**

- 5.56 **Kidsgrove** forms an urban centre in the borough. The centre performs a secondary, but complementary role to the Strategic Centre, providing a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. Kidsgrove is a key location for growth of a scale appropriate to the character and distinctiveness of Kidsgrove and to maintain its vitality and viability.

### **Rural Service Centres**

- 5.57 The Rural Service Centres in the borough provide a range of essential services and facilities to support a proportionate level of growth according to their size, role and function. It is appropriate to direct a level of growth to the Rural Service Centres commensurate to their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character. It is recognised that the Rural Centres vary in terms of size and range of facilities and therefore, the scale of growth directed to each settlement will be relative to its role, function and infrastructure capacity.
- 5.58 The Rural Service Centres of Audley, Baldwins Gate, Keele Village / University Hub, Loggerheads and Madeley and Betley have a range of services, facilities, infrastructure and public transport to support a level of growth proportionate to their size, role and function.

### **Other Settlements and Rural Areas**

- 5.59 The housing requirement for the Borough can be accommodated in the strategic centre, urban centre and rural service centres which are well connected to community facilities, infrastructure and public transport to accommodate a level of growth proportionate to their role and function.



5.60 The remaining settlements in the rural area comprise smaller villages with limited facilities and infrastructure to support strategic scale growth. Housing growth in the wider rural area can be delivered through the mechanisms of community led development, rural exception sites and Neighbourhood Plans. The Local Plan will not propose allocations for settlements within this tier of the settlement hierarchy.

### **Safeguarded Land**

5.61 NPPF Paragraph 148 sets out that when defining Green Belt boundaries, plans should:

*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;*

*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;*

5.62 In accordance with the NPPF the Council has examined whether there is a requirement for the local plan to identify safeguarded land between the urban area and the Green Belt. A study<sup>5</sup> was undertaken on behalf of the Council by Arup to assess the need for safeguarded land. This Study should be read alongside Part 3 of the Green Belt Review undertaken by Arup which also provided advice on this matter. The Green Belt Review (Part 3) 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 as follows:

- **Stage 1 Requirement:** Determine whether it is 'necessary' to identify safeguarded land by assessing the likely scale of brownfield land and considering whether windfall sites are a reliable source of supply,
- **Stage 2 Quantum:** Project forward current development needs for a specified duration,
- **Stage 3 Location:** In order to identify which sites should be safeguarded, apply the site selection process, considering all relevant evidence including the Green Belt Review, SA, and the overall spatial strategy.

5.63 In relation to Stage 1 the Arup study concludes that further Green Belt release may be required to meet local housing needs beyond the end of the plan period. In relation to employment land and proposed allocation of strategic sites supply will endure beyond the plan period which does not generate a need to safeguard land for employment.

---

<sup>5</sup> Green Belt Safeguarded Land Advice (Assessing the need for Safeguarded Land) Arup, May 2024

- 5.64 Stage 2 of the Arup study examined the potential quantum of safeguarded land that may be required based on projecting forward the current assessment of local housing need. The study concludes that if the council decided to safeguard land for housing there may be a need to provide for a 5 - 7.5-year supply of housing land which could deliver between 1,562 - 2,342 dwellings.
- 5.65 The Arup study has also examined a range of further additional factors to consider informing the council's decision regarding whether to safeguard land in the local plan. This has included consideration of national policy uncertainty, determining development needs beyond the plan period, housing and employment land supply, safeguarded land exceptional circumstances, housing and employment site options and the likely timing of a local plan review.
- 5.66 The Council has decided that it is not appropriate to safeguard land in the local plan between the urban area and the Green Belt for housing or employment for the following reasons:
- a) There is significant uncertainty at a national level which presents difficulties in robustly establishing housing and employment needs beyond the end of the plan period to inform safeguarded land requirements.
  - b) In accordance with national policy, there needs to be a robust exceptional circumstances case to amend the Green Belt to provide for safeguarded land. Given the significant uncertainty in establishing housing and employment needs beyond the end of the plan period, the council considers that there is not an exceptional circumstances case.
  - c) The local plan proposes a degree of flexibility with the provision of a 10% housing supply buffer. It is considered that this flexibility in housing supply will contribute to needs beyond the end of the plan period.
  - d) The proposed spatial strategy for employment includes a supply which will contribute to needs beyond the end of the plan period. Therefore, there is no need to safeguarded land for employment.
  - e) In relation to housing site options there are insufficient available Green Belt options to 'safeguard' to provide 5 – 10 years housing land supply beyond the plan period.
  - f) Reforms are anticipated to the planning system including in relation to plan making which may require an early review of the local plan. On this basis the spatial strategy may need to be reviewed in the short term in a different legislative context. Therefore, the requirement for safeguarded land is uncertain.

### **Establishing Spatial Strategy Options**

- 5.67 The following section of the topic paper sets out the broad housing distribution and site options that were considered through consultation on the Issues and Strategic Options (2022) and the Regulation 18 Local Plan (2023). Growth options were informed by strategic factors including development quantum and broad distribution factors including settlement hierarchy. In terms of

bottom-up factors, housing site options were appraised through the site selection process and SA which is set out in the Site Selection Topic Paper and SA Report (2024).

### **Issues and Strategic Options (2022)**

- 5.68 The 'Issues and Strategic Options' stage consulted on broad concepts and 'directions for growth' to establish preferred locations for growth. This stage of the plan did not present a detailed distribution of development with site options or proposed quantum of development for specific locations.
- 5.69 The local plan presented broad distribution options at this stage that would require consideration if the housing requirement could not be met within the existing settlement boundaries. A range of 'growth direction options' were presented which explored broad locations where development might be located adjacent to existing settlements in the borough as urban or rural extensions. At this stage urban or rural extensions was considered to provide approximately 1,000 dwellings.

### **New Settlement Options**

- 5.70 No new settlement options were identified at this stage, and none have been submitted for consideration as part of the local plan preparation process. New settlement options have been discounted as LHN can be provided for in the main settlements (in accordance with the settlement hierarchy) without the need for a new settlement. Also, in relation to the Duty to Co-operate and discussions with neighbouring authorities there is no definitive unmet housing need that would require consideration of a new settlement option in Newcastle-under-Lyme. Therefore, at this stage the option of a new settlement was ruled out as unreasonable.

### **Growth Direction Options**

- 5.71 The following growth direction options were consulted on at the issues and options stage:
- **Growth Direction Zero:** Maximise growth within development boundaries and increase density in centres.
  - **Growth Direction 1:** Development on strategic sites outside the Green Belt - Large scale rural extensions.
  - **Growth Direction 2:** Strategic Green Belt release for an urban extension – University Growth Corridor
  - **Growth Direction 3:** Green Belt release for development of strategic sites – Talke and Chesterton expansion
  - **Growth Direction 4:** Green Belt release for development of strategic sites – Kidsgrove expansion

- **Growth Direction 5:** Green Belt release for development of strategic sites – Audley Rural Expansion
  - **Growth Direction 6:** Combination of strategic sites across the Borough comprising both sites outside the Green Belt and sites which require Green Belt release.
- 5.72 In relation to responses received to this consultation stage and SA, Option 6 (hybrid option) was identified as a preferred approach. Option 6 provides an approach capable of delivering housing and employment need in a balanced way utilising brownfield options and identifying Green Belt release where required to meet objectively assessed needs for development. At the 'issues and options' stage it was acknowledged that this growth scenario would require further refinement at Regulation 18 to align with top-down strategic factors including broad distribution factors, settlement hierarchy and bottom-up factors relating to the merits of housing and employment site options.
- 5.73 **Growth Direction Zero** would not meet the identified development requirements in the borough as a single option. There are limited brownfield site options in the borough. However, the principle of maximising development at sites within development boundaries are also reflected in growth direction options 1-6 as a starting point i.e. the council has sought to maximise brownfield land opportunities / land within development boundaries before looking at site options outside of existing development boundaries.
- 5.74 **Growth Direction 1** was discounted as this would promote large scale growth in the rural area in locations with limited access to key facilities and essential infrastructure and not consistent with broad distribution factors including settlement hierarchy.
- 5.75 **Growth Direction 2** including Green Belt release in the University Growth corridor would not provide a balanced distribution of development across the main settlements in the settlement hierarchy. In terms of available site options this growth scenario would also not provide for local housing needs in full.
- 5.76 **Growth Direction 3** including Green Belt release for development at Talke and Chesterton only would not provide a balanced distribution of development across the main settlements in the settlement hierarchy. In terms of available site options this growth scenario would also not provide for local housing needs in full.
- 5.77 **Growth Direction 4** included Green Belt release at Kidsgrove would not provide a balanced distribution of development across the main settlements in the settlement hierarchy. In terms of available site options this growth scenario would also not provide for local housing needs in full.
- 5.78 **Growth Direction 5** includes Green Belt release only at the settlement of Audley which is not consistent with broad distribution factors and settlement hierarchy. In terms of available site options this growth scenario would also not provide for local housing needs in full.

### **Regulation 18 Spatial Strategy (2023)**

- 5.79 The broad strategic approach to the distribution of growth (Growth Direction 6 / Hybrid Approach) was taken forward to the next stage of the plan at Regulation 18 in 2023. At this stage the growth strategy was further refined to align with broad distribution factors, the settlement hierarchy and in consideration of the merits of housing and employment site options. A preferred spatial strategy and distribution of development was established with housing quantum and proposed site allocations. This strategy was capable of providing for local housing and employment needs derived from the HENA at the time.
- 5.80 In accordance with this strategic approach the local plan proposed to primarily direct housing and employment growth to the strategic and urban centres of Newcastle-under-Lyme Town and Kidsgrove. Smaller scale growth is directed to the rural service centres of Audley, Baldwins Gate, Keele Village / University Hub, Loggerheads and Madeley and Betley (proportionate to their role, function, facilities and infrastructure). Housing site options for these settlements were considered in relation to broad distribution factors, settlement hierarchy and the merits of individual sites through the site selection process.

### **Assessment of Site Options**

- 5.81 The main source of sites for assessment has been the SHELAA and sites submitted for consideration in response to local plan consultation stages. The SA Report includes an assessment of the site options considered for potential allocation in the local plan. Also appended to the SA Report are all the individual sites that have been through SA.
- 5.82 The full site selection process, consideration of all sites and methodology is set out in the Site Selection Topic Paper (2024) and the SA Report. The assessment of sites has included stages of technical assessment including site specific SA. The refinement of site options has also been informed by a range of key evidence studies relating to Green Belt, transport, air quality, viability, flood risk, landscape and Habitats Regulation Assessment (HRA) and Appropriate Assessment (AA). Furthermore, extensive engagement has been undertaken with key stakeholders to refine the shortlist of potential allocation sites.
- 5.83 The Green Belt Study has formed a key part of the site selection process, alongside other evidence through assessing the sites against the Green Belt purposes and the impact of removing sites from the Green Belt.

### **Reasonable Alternative Growth Scenarios**

- 5.84 At Regulation 18 consideration has also been given to whether there are reasonable alternative growth scenarios that are consistent with strategic factors including broad distribution factors and settlement hierarchy. This

gives consideration to preceding stages of work including development quantum and the broad distribution factors.

### **Strategic and Urban Centres**

- 5.85 The emerging spatial strategy seeks to concentrate growth in the main settlements of Newcastle-under-Lyme (Strategic Centre) and Kidsgrove (Urban Centre). The sources of sites for these areas are primarily from the SHELAA and sites submitted through the local plan consultation stages. In accordance with strategic factors and providing for local housing need (LHN) all suitable, available and achievable strategic scale housing site options in and adjoining these settlements were identified in the preferred spatial strategy at Regulation 18. As all these strategic sites were identified in the preferred spatial strategy at this stage there were no further reasonable alternative options to consider for these settlements.

### **Rural Service Centres**

- 5.86 In accordance with strategic factors it is appropriate to primarily direct growth to the strategic and urban centres. As part of a balanced distribution of development a proportionate level of growth is also appropriate in the rural service centres commensurate with their role and function including the range of key facilities and infrastructure. The Regulation 18 preferred spatial strategy identified a proportionate quantum of development for the rural service centres that combined with the strategy for the strategic and urban centre provided for LHN.
- 5.87 A site selection process was also undertaken for the rural service centres consistent with the broad distribution factors and settlement hierarchy to direct an appropriate scale of growth to these settlements. Bottom-up considerations and the merits of the sites have then been considered informed by site specific SA, key evidence studies and ongoing stakeholder engagement to identify a shortlist of preferred sites.
- 5.88 It is considered that there are no further reasonable alternative growth scenarios for the rural service centres. Scenarios identifying higher levels of growth in these settlements would be inappropriate in relation to broad distribution factors, settlement hierarchy and the availability of key facilities / infrastructure. The most sustainable sites for these settlements have been identified through the site selection process. It is considered that there are no further reasonable alternative growth scenarios to appraise for these settlements. The Preferred Spatial Strategy option and site package consulted on at Regulation 18 is set out in Table 1 below:

**Table 1 Regulation 18 Local Plan – Proposed Spatial Strategy**

<b>Settlement</b>	<b>Proposed Housing Allocations / Housing Supply</b>	<b>Capacity</b>
<b>Newcastle Under Lyme</b> (Strategic Centre)	CH13 Castletown Grange, Douglas Road, Cross Heath	28 (net of -7 following demolition of 35 units.
	CH14 Maryhill Day Centre, Wilmott Drive, Cross Heath	30
	CT1 Land at Red Street and High Carr Farm, Chesterton	750
	KS3 Land at Blackbank Road, Knutton	150
	KS11 Knutton Community Centre, High Street Knutton	9
	KS17 Knutton Recreation Centre, Knutton Lane	55
	KS18 Land North of Lower Milehouse Lane, Knutton	10
	KS19 Knutton Lane	5
	SB12 Land adjacent to Clayton Lodge Hotel	60
	SP11 Former Keele Municipal Golf Course	900
	SP12 Site off Glenwood Close, Silverdale	70
	SP2 Cheddar Drive, Silverdale	8
	SP22 Former Playground off Ash Grove, Silverdale	36
	SP23 Land at Cemetery Road / Park Lane	200
	TB6 Former Poole Dam Pub Site, Orme Road, Poolfields, Newcastle	13
	TB19 Land south of Newcastle Golf Club, Whitmore Road	550
	TB23 Land West of Galingale View, Thistleberry	124
	TC22 Marsh Parade, Newcastle	70
	TC40 Car park, Blackfriars Road, Newcastle	10
	TC7 land bound by Ryecroft, Ryebank Merrial Street, Corporation Street and Liverpool Road, Newcastle.	75
	<b>Sites Total</b>	<b>3118</b>
<b>Kidsgrove</b> (Rural Service Centre)	BL18 Clough Hall, Talke	285
	BL24 Land adjacent 31 Banbury Street, Talke	10
	BL32 Land at Congleton Road, Butt Lane	20
	BL8 Land adjacent to roundabout at West Avenue, Kidsgrove	40
	KG6 William Road, Kidsgrove (site of the Galley PH)	6
	RC8 Land at Liverpool Road (part of Birchenwood Kidsgrove (Parcel 2)	6

	NC13 Land West of Bullockhouse Road, HARRISEAHEAD	100
	NC77 Bent farm, Newchapel	80
	TK10 Land at Crown bank, Talke	170
	TK17 land off St Martins Road, Talke	40
	TK27 Land off Copice Road, Talke	90
	TK6 Site at Coalpit Hill, Talke	10
	<b>Sites Total</b>	<b>857</b>
<b>Audley</b> (Rural Service Centre)	AB12 land East of Diglake Street, Bignall End	150
	AB15 Land North of Vernon Avenue, Audley	40
	AB32 land at Nursery Gardens, Audley	20
	AB33 Land off Nantwich Road / Park Lane Audley	60
	<b>Sites Total</b>	<b>270</b>
<b>Keele</b> (Rural Service Centre)	KL13 Keele Science Park Phase 3, University of Keele	220
	<b>Sites Total</b>	<b>220</b>
<b>Loggerheads</b> (Rural Service Centre)	LW53 land at Corner of Mucklstone Wood Land and Rock Lane. Loggerheads	130
	LW87 Former Petrol Station, Eccleshall Road, Loggerheads	12
	<b>Sites Total</b>	<b>142</b>
<b>Madeley and Betley</b> (Rural Service Centre)	MD29 Land North of Bar Hill Madeley	<b>150</b>
	<b>Sites Total</b>	<b>150</b>



### **Regulation 18 Consultation Response**

- 5.89 Following the Regulation 18 consultation undertaken in 2023 there was support for the spatial strategy approach in primarily directing growth to the main settlements of Newcastle-under-Lyme (Strategic Centre) and Kidsgrove (Urban Centre). Support was also received for distributing a proportionate level of growth in the rural area within the Rural Service Centres.
- 5.90 Representations were received from site promoters in relation to housing site options in the Rural Service Centres seeking inclusion of additional sites and higher levels of growth in these settlements. However, a number of good sites have been promoted in and adjoining the main settlements of Newcastle-under-Lyme and Kidsgrove which alongside proportionate growth in rural service centres can provide for Local housing need. On this basis, there is no compelling reason to direct a higher level of growth to the Rural Service Centres.
- 5.91 Responses from local communities and parishes raised some concerns about the level of development directed to the Rural Service Centres in view of the availability and capacity of existing facilities and infrastructure. In relation to this issue, the infrastructure delivery plan (IDP) identifies key infrastructure requirements to support planned growth. Delivery of key facilities and infrastructure will be secured through a combination of financial contributions and service provider delivery.
- 5.92 In response to the consultation no additional strategic scale sites were submitted for consideration in the Strategic, Urban and Rural Service Centres. Furthermore, no new settlement options were identified or submitted for consideration.
- 5.93 Responses were received from statutory consultees including Natural England, Environment Agency, Historic England and Highways England identifying consideration of relevant constraints and infrastructure requirements. However, no fundamental issues were raised affecting the delivery of the spatial strategy and the ability to meet local housing need. Ongoing engagement with these bodies has informed a refinement of the proposed spatial strategy including further consideration of site constraints and infrastructure requirements.
- 5.94 Responses received from neighbouring authorities were received. A number broadly supported the proposed spatial strategy approach. Although there were comments made in relation to the impact of the strategic employment sites. As detailed in Section 3 of this topic paper no requests have been made to accommodate unmet housing need from neighbouring authorities that would affect a change in the spatial strategy approach.

### **Further Consideration of Reasonable Alternatives**

- 5.95 Following the Regulation 18 consultation further consideration was given to whether there are further reasonable alternative growth scenarios to consider and appraise through the preparation of the local plan. No further strategic scale housing site options were identified or submitted for consideration in the Strategic Centre of Newcastle-under-Lyme or the Urban Centre of Kidsgrove. All proposed strategic sites in these settlements are currently included in the plan and there are no further reasonable alternative growth scenarios to consider.
- 5.96 The Regulation 18 preferred spatial strategy primarily directs growth to the strategic and urban centre with proportionate growth directed to the rural service centres. Responses to the Reg 18 consultation from site promoters have sought a higher level of growth in the rural service centres. This is not consistent with broad distribution factors, settlement hierarchy, the role and function of these settlements and range of key facilities and infrastructure. Furthermore, local housing need can be provided for at the main settlements with proportionate growth in the rural service centres. Therefore, at this stage an alternative growth scenario of higher growth at the rural service centres was not considered to be reasonable.
- 5.97 In relation to the consultation response consideration was given to whether a lower level of growth in the rural service centres might be appropriate. The proposed level of growth in the rural service centres is proportionate to their role, function and availability of key facilities and infrastructure. The local plan and IDP plans for and secures the necessary infrastructure to support proportionate growth in these settlements which can be accommodated sustainably. In addition to the available sites in the strategic and urban centre, the level of growth planned for in the rural centres is also required to deliver the local plan housing requirement. For these reasons it is considered that a lower growth scenario in the rural service centres is not a reasonable alternative.
- 5.98 It is concluded that following the Regulation 18 consultation and in relation to strategic factors and bottom-up site considerations there are no further reasonable alternative growth scenarios. Therefore, the next step in the plan involved a refinement of the preferred Regulation 18 spatial strategy taking into account site specific SA, key evidence studies and technical work, and ongoing engagement with key stakeholders.

### **Housing Quantum**

- 5.99 Following the Regulation 18 consultation the housing and economic needs assessment (HENA) was updated and published in 2024. As discussed earlier in Section 5, the HENA update provided justification to base the housing requirement on a preferred economic growth scenario requiring the delivery of 400 dwellings per annum and 8000 homes over the plan period to 2040. The local plan will need to provide for this quantum of housing development

including a supply buffer of 10%. Therefore, the Regulation 19 Local Plan spatial strategy would be required to provide for this quantum of development to meet housing needs over the plan period.

### **Spatial Strategy Refinement / Site Selection**

- 5.100 Following the Regulation 18 consultation further work has been undertaken to refine the spatial strategy. This has been informed by site specific SA and key evidence studies including Green Belt, transport, air quality, viability, flood risk, landscape, heritage, water cycle study and habitats regulation assessment (HRA) and Appropriate Assessment (AA). Further engagement has also been undertaken with site promoters which has included the production of further site-specific technical work and master planning informing the refinement of housing site options. Extensive and ongoing engagement has also been undertaken with key stakeholders and statutory consultees to inform the refinement of the spatial strategy and proposed site allocations.
- 5.101 A key part of the evidence base produced following the Regulation 18 consultation is the council's transport study and associate modelling work. This study has undertaken transport model runs which assess background traffic growth and the additional impact of site options over the plan period. The study has not identified any fundamental issues affecting the delivery of the strategy and has identified where transport improvements are required in relation to cumulative impact and site-specific impacts.
- 5.102 In terms of heritage the Council has undertaken a number of heritage impact assessments for relevant sites which has informed site allocation policies. No fundamental issues have been identified which affect the delivery of the spatial strategy.
- 5.103 The Level 1 Strategic Flood Risk Assessment which incorporates the latest flood risk data to assess the potential impact of flooding from all sources including surface water. This has informed the refinement of the spatial strategy, assessment of site potential and application of the sequential approach.
- 5.104 The Local Plan Viability Study has assessed the viability of site typologies in relation to all relevant policy requirements & in doing has demonstrated the relative deliverability of schemes of varying scale & characteristics and the prospective implications of applying the full raft of policy requirements that have been presented in the Reg.19 Local Plan.
- 5.105 The Water Cycle Study has been finalised which has informed site specific infrastructure requirements to ensure site options are deliverable.
- 5.106 The IDP has been finalised and identifies the infrastructure requirements required to support the spatial strategy and incorporates detailed schedules of specific projects and how these will be delivered.
- 5.107 As a result of this process the following changes were made to the spatial strategy that was consulted on at Regulation 18 as set out in Table 2 below:



**Table 2 Proposed Changes to the Regulation 18 Spatial Strategy**

Settlement	Area / Site Options	Ward	Capacity (Reg 18)	Capacity (Reg 19)	Proposed Changes
<b>Newcastle Under Lyme</b> (Strategic Centre)	CT1 Land at Red Street and High Carr Farm, Chesterton		750	530	Site reduced to 530 dwellings to take account of remediation of historic uses on the site, south of Bells Hollow.
	SB12 Land adjacent to Clayton Lodge Hotel		60	60	Site now a commitment, post March 2023, removed from proposed allocations and included in housing land supply.
	SP11 Former Keele Municipal Golf Course		900	900	<ul style="list-style-type: none"> <li>• Masterplan has changed orientation of the site, split into four distinct parcels.</li> <li>• Introduction of country park in the centre of the site.</li> </ul>
	SP12 Site off Glenwood Close, Silverdale		70	0	Site removed due to concerns over access, flood risk and place making issues given changed position re SP11 masterplan
	SP23 Land at Cemetery Road / Park Lane		200	200	<ul style="list-style-type: none"> <li>• Site boundary extended to take account of access arrangements and introduction of adjacent land holdings.</li> <li>• Providing a direct non-car link between Cemetery Road and A525</li> </ul>
	TC19 Hassell Street Car Park		0	5	Introduction of car parking sites for allocation and inclusion in local plan housing supply following completion of car parking review.
	TC20 King Street Car Park		0	10	
	TC50 Cherry Orchard Car Park		0	5	
	TC52 Goose Street Car Park		0	25	
	TC71 Midway Car Park		0	100	

	CH3 Land at Hoon Avenue		0	100	Introduction of new appeal site.
<b>Kidsgrove</b> (Urban Centre)	BL18 Clough Hall, Talke	Talke and Butt Lane	285	150	Site reduced to 150 to take account of BNG and also policy requirements for retention of playing pitches on site.
	RC8 Land at Liverpool Road (part of Birchenwood Kidsgrove (Parcel 2))	Kidsgrove and Ravenscliffe	6	6	Site now a commitment, post March 2023, removed from proposed allocations and included in housing land supply.
	NC77 Bent farm, Newchapel	Newchapel and Mow Cop	80	0	<ul style="list-style-type: none"> <li>• Site removed due to GB impacts and concerns over access.</li> <li>• Cross boundary GB impacts also raised by Stoke-on-Trent City Council.</li> </ul>
<b>Audley</b> (Rural Service Centre)	AB12 land East of Diglake Street, Bignall End	Audley	150	125	<ul style="list-style-type: none"> <li>• Capacity reduced to 125 following master planning work on site.</li> <li>• Master planning takes account of BNG requirements</li> </ul>
	AB15 Land North of Vernon Avenue, Audley	Audley	40	33	Capacity reduced to 33
	AB32 land at Nursery Gardens, Audley	Audley	20	0	Site removed due primarily to concerns over access, impacts on Green Belt and agricultural land impacts.
	AB33 Land off Nantwich Road / Park Lane Audley	Audley	60	55	<ul style="list-style-type: none"> <li>• Capacity reduced to 55 following masterplanning work on site.</li> <li>• Masterplanning takes account of BNG requirements.</li> </ul>
<b>Keele</b> (Rural Service Centre)	KL15 Land South of A525 between Keele University and Newcastle	Keele	0	260	Following consultation at Reg 18 on the principle of strategic employment / mixed use allocations KL15 has been included in

					the plan. This has been informed by SA, the evidence base and master planning work.
<b>Loggerheads</b> (Rural Service Centre)	LW87 Former Petrol Station, Eccleshall Road, Loggerheads	Loggerheads	12	12	Site now has a resolution to grant planning permission, post March 2023, removed from proposed allocations and included in housing land supply.
<b>Baldwins Gate</b> (Rural Service Centre)	LW 74 Baldwins Gate		0	200	Introduction of new appeal site.

5.107 As a result of the proposed changes the Regulation 19 Local Plan Spatial Strategy is defined in Table 3 below. The proposed Regulation 19 local plan spatial strategy will deliver a total of 8,663 homes which provides for the plan housing requirement of a minimum of 8,000 dwellings (400 dwellings per annum) over the plan period 2020 – 2040 and a housing supply buffer.

**Table 3 Regulation 19 Local Plan – Proposed Spatial Strategy**

<b>Settlement</b>	<b>Proposed Housing Allocations / Housing Supply</b>	<b>Capacity</b>
<b>Newcastle Under Lyme</b> (Strategic Centre)	CH13 Castletown Grange, Douglas Road, Cross Heath	7
	CH14 Maryhill Day Centre, Wilmott Drive, Cross Heath	30
	CT1 Land at Red Street and High Carr Farm, Chesterton	530
	KS3 Land at Blackbank Road, Knutton	150
	KS11 Knutton Community Centre, High Street Knutton	9
	KS17 Knutton Recreation Centre, Knutton Lane	55
	KS18 Land North of Lower Milehouse Lane, Knutton	10
	KS19 Knutton Lane	5
	SP11 Former Keele Municipal Golf Course	900
	SP2 Cheddar Drive, Silverdale	8
	SP22 Former Playground off Ash Grove, Silverdale	36
	SP23 Land at Cemetery Road / Park Lane	200
	TB6 Former Poole Dam Pub Site, Orme Road, Poolfields, Newcastle	13
	TB19 Land south of Newcastle Golf Club, Whitmore Road	550

	TB23 Land West of Galingale View, Thistleberry	124
	TC7 land bound by Ryecroft, Ryebank Merrial Street, Corporation Street and Liverpool Road, Newcastle.	75
	TC19 Hassell Street Car Park	5
	TC20 King Street Car Park	10
	TC22 Marsh Parade, Newcastle	70
	TC40 Car park, Blackfriars Road, Newcastle	10
	TC50 Cherry Orchard Car Park	5
	TC52 Goose Street Car Park	25
	TC71 Midway Car Park	100
	CH3 Land at Hoon Avenue	100
	<b>Sites Total</b>	<b>3027</b>
<b>Kidsgrove</b> (Rural Service Centre)	BL18 Clough Hall, Talke	150
	BL24 Land adjacent 31 Banbury Street, Talke	10
	BL32 Land at Congleton Road, Butt Lane	20
	BL8 Land adjacent to roundabout at West Avenue, Kidsgrove	40
	KG6 William Road, Kidsgrove (site of the Galley PH)	6
	NC13 Land West of Bullockhouse Road, Harriseahead	100
	TK10 Land at Crown bank, Talke	170
	TK17 land off St Martins Road, Talke	40
	TK27 Land off Copice Road, Talke	90
	TK6 Site at Coalpit Hill, Talke	10
	<b>Sites Total</b>	<b>636</b>
<b>Audley</b> (Rural Service Centre)	AB12 land East of Diglake Street, Bignall End	125
	AB15 Land North of Vernon Avenue, Audley	33
	AB33 Land off Nantwich Road / Park Lane Audley	55
	<b>Sites Total</b>	<b>213</b>
<b>Baldwins Gate</b> (Rural Service Centre)	<b>LW 74 Baldwins Gate</b>	200
	<b>Sites Total</b>	<b>200</b>
<b>Keele</b> (Rural Service Centre)	KL13 Keele Science Park Phase 3, University of Keele	220
	KL15 Land South of A525 between Keele University and Newcastle	260
	<b>Sites Total</b>	<b>480</b>



Classification: NULBC **UNCLASSIFIED**

<b>Loggerheads</b> (Rural Service Centre)	LW53 land at Corner of Mucklstone Wood Land and Rock Lane. Loggerheads	130
	<b>Sites Total</b>	<b>130</b>
<b>Madeley and Betley</b> (Rural Service Centre)	Land North of Bar Hill Madeley	150
	<b>Sites Total</b>	<b>150</b>
<b>Overall Totals</b>	<b>Housing Allocations / Existing Supply</b>	4,512
	<b>Windfall Allowance</b>	372
	<b>Overall Total Housing Supply</b>	8,663
	<b>Percentage above LHN (Standard Method)</b>	8.3

Classification: NULBC **UNCLASSIFIED**

## **6 Next Steps**

### **Plan Finalisation**

- 6.1 Once the period for representations on the proposed submission plan has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 6.2 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the local plan, these will be prepared (alongside SA if necessary) and then subject to consultation (with an SA Report Addendum published alongside if necessary).
- 6.3 Once found to be 'sound' the local plan can be adopted by the Council. At that time an 'SA Adoption Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.