



Employment 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 employment. 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 employment led with detailed matters regarding the spatial strategy for housing set out in a separate topic paper. However, the proposed quantum of development for housing and employment are closely aligned and relate to the preferred economic growth scenario identified through the Housing and Economic Needs Assessment (HENA, 2024).
- 1.3 The proposed employment 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 Regulation 19 SA Report will provide further detail on the process of identifying and appraising reasonable alternative growth scenarios for employment and establishing the preferred 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:

[Local plan evidence base – Newcastle-under-Lyme Borough Council \(newcastle-staffs.gov.uk\)](https://www.newcastle-staffs.gov.uk)

Overview of Topic

- 1.5 The spatial strategy sets out the overall proposed distribution for employment 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 employment spatial strategy has involved the identification and appraisal of reasonable alternative growth scenarios which are discussed further in this paper. A range of factors have influenced the identification of reasonable growth scenarios including the strategic objectives of the Plan, 'strategic factors', and site options. Strategic factors include objectively assessed employment land needs (including growth requirements of key sectors) 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 sets out the Government’s economic objective (as one of the three pillars of sustainable development) for the planning system which is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure. Paragraph 9 sets out that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character needs and opportunities of each area.
- 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 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 NPPF Chapter 6 Building a strong, competitive economy focuses on supporting economic growth and prosperity. Paragraph 85 sets out that local plans should create conditions in which businesses can invest, expand and adapt, including supporting economic growth and productivity. This should take account of business needs and wider opportunities for development. Each area should build on its strengths, counter weaknesses and address future challenges, in line with the Government's Industrial Strategy. This is particularly important where the Britain can be a global leader in driving innovation, and in areas with high levels of productivity.
- 2.10 Paragraph 86 provides four principles for planning policies:
- a) Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other policies for economic development and regeneration;
 - b) Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - c) Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - d) Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 2.11 Paragraph 87 provides that recognition should be given and to address specific locational requirements of different sectors. This includes making provision for clusters and networks of knowledge and data driven, creative or high technology industries; and for storage and distribution at a variety or scale and in suitably accessible locations.
- 2.12 Paragraphs 88 covers supporting a prosperous rural economy, and policies should enable:
- a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
 - b) The development and diversifications of agricultural and other land-based rural business;
 - c) Sustainable rural tourism and leisure development which respect the character of the countryside; and

- d) The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 2.13 Paragraph 89 recognises that sites may be beyond settlement boundaries and in locations not well served by public transport. In such circumstances development should be sensitive to its surroundings, does not have an unacceptable impact on local roads and takes account of how accessibility by sustainable travel modes can be improved. The use of previously developed land (brownfield sites), and sites well related to existing settlements should be encouraged.
- 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 can help to promote vitality.
- 2.15 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.
- 2.16 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.
- 2.17 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.
- 2.18 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

- 2.19 The 'Housing and Economic Needs Assessment' section of the PPG provides detailed guidance for local authorities in planning to support the economic needs of the area including the provision of employment land.
- 2.20 Paragraph 25 states that strategic policy making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions. The guidance also acknowledges that functional economic market areas (FEMAs)

can overlap administrative areas so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area.

2.21 Paragraph 26 provides guidance to policy making authorities in preparing and maintaining evidence about business needs. Close liaison will need to be undertaken with the business community including taking account of the Local Industrial Strategy, to understand current and future requirements. Strategic policy making authorities will need to assess:

- the best fit functional economic market area;
- the existing stock of land for employment uses within the area;
- the recent pattern of employment land supply and loss;
- evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data and market intelligence;
- wider market signals relating to economic growth, diversification and innovation; and
- any evidence of market failure.

2.22 Paragraph 27 sets out that in establishing a current and robust picture of future needs a range of data will need to be examined such as:

- sectoral and employment forecasts and projections.
- demographically derived assessments of current and future local labour supply.
- analysis based on the past take-up of employment land and property and/or future property market requirements.
- consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models.

2.23 Paragraph 27 also states that authorities will need to take account of longer-term economic cycles in assessing this data and consider and plan for the implications of alternative economic scenarios.

2.24 Paragraph 28 states that local authorities should identify the existing stock of employment land and identify the recent pattern of supply and loss. This should be considered by type of employment and by sub areas where there are distinct property market areas.

2.25 Paragraph 29 provides guidance on the assessment of market demand so that strategic planning authorities can provide for an appropriate supply of land to meet economic needs. Assessment of market demand will consider recent

employment land take-up and projections and forecasts, including for different uses. Analysing supply and demand also allows policy makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied.

- 2.26 Paragraph 30 sets out how employment land requirements should be derived. In translating employment and output forecasts into employment land requirements, consideration should be given to Standard Industrial Classification for sectors to both use classes and type of property, and for employment densities (jobs to floorspace) and plot ratios (floorspace to site area).
- 2.27 Paragraph 31 provides guidance for local authorities in assessing need and allocating space for logistics. For logistics, strategic facilities serving national and regional markets, are likely to require significant land and good access to strategic transport networks. Where a need exists, authorities should collaborate with other authorities, infrastructure providers and other interest to identify needs across market areas. This can be informed by:
- Engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
 - Analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;
 - Analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and
 - Engagement with the local enterprise partnership and review of their plans and strategies, including economic priorities within Local Industrial Strategies.
- 2.28 Paragraph 31 also states that local authorities will need to consider the most appropriate locations for meeting identified needs. Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets.
- 2.29 Paragraph 32 provides guidance on assessing the specific locational requirements of specialist or new sectors. It is important to establish an understanding of specific requirements in the local market which affect the types of land and premises needed. Clustering of certain industries can play an important role in supporting collaboration, innovation, productivity, and

sustainability, as well as in driving the economic prospects of the areas in which they locate.

Local Policy Context

Newcastle-under-Lyme Corporate Plan 2022 to 2026

- 2.30 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.
- 2.31 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.
- 2.32 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.

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

- 2.33 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.

- 2.34 Policy SP1 sets out the 'Spatial Principles of Targeted Regeneration' including directing regeneration to the following areas:
- Employment provision will be focussed towards sites accessible to and within the North Staffordshire Regeneration Zone.
 - Keele University and Science Park will continue to be the focus for high value business growth in a range of knowledge-based industries.
 - Office development will be focussed towards Newcastle-under-Lyme Town Centre.
- 2.35 The adopted local plan sets out employment land targets for Newcastle-under-Lyme Borough and Stoke-on-Trent City Council. For Newcastle-under-Lyme the plan identifies a requirement to provide a rolling 5-year supply of 28 hectares and an indicative longer-term supply of 84 hectares.
- 2.36 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
- 2.37 Area Spatial Policy 4 for Newcastle Town Centre makes provision for 60,000sqm of additional gross office floorspace within, or on the edge of the town centre to accommodate new employment of a type in keeping with the role of the Town Centre. The policy also identifies the importance of establishing links between the Town and Keele University and Science Park in marketing the town as a university town and a place for research and learning.
- 2.38 Area Spatial Policy 5 for Newcastle and Kidsgrove Urban Areas identified a need for 104 hectares of employment land to be brought forward over the plan period.
- 2.39 Area Spatial Policy 6 for the rural area identified a priority to support investment in Keele University and Science Park to support local knowledge and skills base and facilitate growth in high value business development.

Joint Local Plan Preparation

- 2.40 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.

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 including economic development and employment land provision. 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 relating to employment land delivery. This also considers the emerging position in relation to the preparation of bilateral officer level draft statements of common ground (SOCGs) with neighbouring authorities. It is anticipated that bilateral Statements of Common Ground will be formally agreed prior to submission of the local plan. Overall conclusions from the duty to co-operate process to date and implications for the employment spatial strategy are set out in this section. This section of the topic paper should be read alongside the Regulation 19 Duty to Co-operate Compliance Statement.

3.3 The emerging position with neighbouring authorities on strategic cross border matters relating to employment is set out below:

- **Unmet Employment Need:** There has been no request from neighbouring authorities to accommodate any unmet employment land need (This position is also set out in Section 3 of the Housing Spatial Strategy Topic Paper, 2024).
- **FEMA Employment Requirements:** Employment land need for the FEMA is split between the Borough of Newcastle-under-Lyme and Stoke-on-Trent City Council. It is agreed that each of the councils will provide for their own need.
- **Strategic Employment Sites:** The Newcastle-under-Lyme local plan spatial strategy includes the allocation of two strategic employment sites (Site references AB2 & KL15 respectively) in the Green Belt which contribute to local needs and wider economic growth (including growth of key sectors) in the north-west & west-midlands sub-regions. The local plan allocation of strategic employment sites has been discussed with neighbouring authorities.

- **Delivery of local employment needs:** The councils agree that Newcastle-under-Lyme will provide for its own employment land requirement through preparation of its local plan.

Conclusions for the Spatial Strategy

3.4 As a result of ongoing engagement with neighbouring authorities the following conclusions are drawn for the local plan spatial strategy.

- The Newcastle-under-Lyme local plan spatial strategy will provide for the objectively assessed employment land need for the Borough as established through the councils housing and economic needs assessment (HENA, 2024).
- The local plan will allocate strategic employment sites to address local employment needs, contribute to sub regional growth and to support the growth of key sectors including large scale logistics and knowledge-based sectors directly associated with Keele University.

4 Relevant Evidence

- 4.1 The following key evidence studies have informed the local plan spatial strategy for employment including strategic factors such as objectively assessed needs for employment and housing. 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 (Turley, 2023 and 2024 update)¹

Employment Land Need

- 4.2 The HENA (2024) identifies a projected employment land requirement for Newcastle-under-Lyme Borough of a minimum of 63ha of employment land over the local plan period 2020 – 2040 (with particular reference to paragraph 6.65). The employment projection is based on the needs of employment sectors within the employment use classes E(g) (I, II, II), B2 and B8.

Employment Land Supply

- 4.3 Employment land supply is approximately 48.9 hectares as of March 2023. Therefore, in relation to projected economic growth there is a need to allocate new sites for employment in the local plan to address development needs over the plan period.

Strategic Employment Site Assessment (Aspinall Verdi, 2024)

- 4.4 A study has been undertaken on behalf of the council by Aspinall Verdi to assess the quantitative and qualitative case for allocating strategic employment sites in the local plan. The study has given consideration to key evidence studies including the HENA, Site Selection Topic Paper (2024), local plan consultation responses and engagement with site promoters. The study includes an in-depth market appraisal of the sites which has also informed the local plan approach to allocating strategic employment sites. The following strategic employment sites have been considered in the study:

- **AB2 – Land adjoining corner of A500 and M6 southbound** (The site extends to circa 80 hectares and would include circa 22 hectares (circa 220,000 sqm of floorspace) of employment land).
- **KL15 – Land South of A525 between Keele University and Newcastle** (incorporating approximately 13ha of employment land)

¹ [Local plan evidence base – Newcastle-under-Lyme Borough Council \(newcastle-staffs.gov.uk\)](https://www.newcastle-staffs.gov.uk)

- **TK30 – Land off Talke Road and A500, Talke** (forms part of a wider area extending to circa 66ha, with approximately 105,000sq m of office, industrial, warehousing & ancillary development floorspace proposed)
- 4.5 The study has concluded there are strong arguments to allocate two strategic employment sites in the local plan, with the strategic allocations contributing to sub-regional economic growth, assist in providing projected employment land needs in the borough and to address the needs of key employment growth sectors.
- 4.6 The allocation of strategic employment sites and the existing supply position has the potential to deliver in excess of the projected employment land requirement identified in the HENA (2024) during the Plan period (to 2040). This approach reflects issues of the development status & qualitative aspects of the existing supply, when allied to the sub-regional and local benefits to be derived from diversifying & providing resilience in supply to the Borough's employment base, as well as delivering employment sites which will benefit economic growth focusing on sectors such as advanced manufacturing, distribution and logistics, supporting technology, and the green economy to generate more skilled jobs.
- 4.7 The study identifies a powerful case to allocate site AB2 to contribute to employment land need in Newcastle-under-Lyme and support investment from key growth sectors including large scale logistics companies.
- 4.8 There is also a clear support for the merits of site KL15 being allocated which would support the delivery of growth aspirations for the Keele University Growth Corridor and Innovation Park. This would also provide for employment growth within key knowledge-based employment sectors directly associated with the University.
- 4.9 Site TK30 has been assessed and for the purposes of this Local Plan, is considered to have constraints which may affect the timely delivery of the site including the ability to achieve site access. It is also a site located in the Green Belt.

Strategic Green Belt Study (Parts 1 – 4, 2017 – 2024)

- 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 plan for Newcastle-under-Lyme.
- 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.
- 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. This includes the examination of reasonable alternative options to Green Belt release.

4.12 The Study was undertaken in four (4) 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)²

- 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

² [Local plan evidence base – Newcastle-under-Lyme Borough Council \(newcastle-staffs.gov.uk\)](http://newcastle-staffs.gov.uk)

release following the consideration of reasonable alternative options as required in national policy.

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 housing and employment 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 housing and employment sites in Newcastle-under-Lyme borough. The assessment identified those sites with weak, moderate & strong 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 (Part 4 - 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 study³ was undertaken on behalf of the Council by Arup to assess the need for safeguarded land for housing and employment uses. 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 The proposed spatial strategy for employment and allocation of sites will deliver a supply of employment land which may endure beyond the plan period. There is also significant uncertainty in robustly establishing what employment land needs

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

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.

Exceptional Circumstances Review

- 4.25 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)

- 4.26 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 employment and supporting infrastructure. It provides an indication of capacity to inform the employment land supply and forms part of the local evidence base for the local plan. The assessment of sites in the SHELAA and those submitted through the local plan consultation stages is the starting point (in addition to existing employment land supply) to identify sufficient provision to meet the employment requirement and in accordance with the emerging spatial strategy.

Conclusions for the Spatial Strategy

- 4.27 The Following conclusions and implications for the employment spatial strategy have been established from the evidence base:
- **Employment Requirement:** The HENA identifies a projected need of a minimum of 63 ha of employment land (with particular reference to paragraph 6.65 of the HENA) to be provided over the plan period.
 - **Delivering FEMA Requirements:** The overall employment needs for the FEMA will be met through the emerging Newcastle-under-Lyme and Stoke-on-Trent City Council local plans.
 - **Relationship to Housing Strategy:** Employment land need identified in the HENA supports the housing strategy and growth of a minimum of 8,000 homes over the plan period (400 dwellings and 237 jobs per annum).
 - **Need for New Employment Allocations:** The current supply of employment land in the borough is insufficient to provide for needs over the plan period to 2040. There is a need to allocate new employment sites in the local plan to address needs & provide a resilient supply over the plan period.
 - **Strategic Employment Allocations:** The allocation of strategic employment sites in the local plan is required to:
 - Effectively address the preferred HENA (2024) economic growth scenario,

- To provide for the projected employment land need from the HENA and give resilience in land supply,
- To contribute towards sub-regional growth aspirations and for key employment sectors including large scale logistics and knowledge-based uses associated with Keele University and the University Growth Corridor.
- **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 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. The Green Belt Exceptional Circumstances case is examined in detail in the Housing Spatial Strategy Topic Paper (2024).
- **Safeguarded Land:** In accordance with the Arup Study (2024), it is considered that there is no need to safeguard land between the urban area and the Green Belt for employment, whilst acknowledging that delivery of the strategic employment sites in their entirety may extend post 2040.

5 Definition and Evolution of the Employment Spatial Strategy

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

Employment Quantum

- 5.2 The HENA (2024) identifies a projected employment land requirement for Newcastle-under-Lyme Borough of a minimum of 63ha of employment land to be provided over the plan period 2020 – 2040. The employment projection is based on the needs of employment sectors within the employment use classes E(g) (I, II, II), B2 and B8.
- 5.3 Employment land growth of approximately also supports and aligns with the proposed housing spatial strategy and delivery of a minimum of 400 dwellings and 237 jobs per annum.

Broad Distribution Factors

- 5.4 Following assessment of employment 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

- 5.5 Newcastle-under-Lyme is not significantly affected by environmental constraints that would affect the delivery of the employment land requirement.

Green Belt

- 5.6 The Green Belt boundary in Newcastle-under-Lyme forms part of the wider North Staffordshire Green Belt. It covers the entire 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.
- 5.7 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.

- 5.8 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.
- 5.9 In establishing the spatial strategy, the council has examined all reasonable alternative options to Green Belt release in order to accommodate objectively assessed needs for housing and employment.
- 5.10 Reasonable 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 as reasonable alternatives:
- 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.
- 5.11 These reasonable alternative options have been assessed through SA, 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 employment and housing requirement in full. Further consideration of these options is set out below as part of the Exceptional Circumstances Case for amending the Green Belt

Exceptional Circumstances Case

- 5.12 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.
- 5.13 The Council has established an exceptional circumstances case for amending the Green Belt to provide for housing and employment needs (consistent with the 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 new homes (400 dwellings per annum) employment land requirement of a minimum of 63ha over the plan period (2020 – 2040) has been confirmed through the Housing and Economic Needs Assessment (2024) particularly paragraph 6.65 in respect of employment uses. To deliver objectively assessed needs for development there is a need to amend the existing borough Green Belt boundaries.
- 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).

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 regarding efficient use of land.
- 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 & revisited in July 2024) was prepared which considered whether the villages of Keele and Whitmore should be recommended for inseting within (excluded from) the Green Belt. The study recommended that Keele is considered for inseting 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 employment need from Newcastle-under-Lyme and this is evidenced through bilateral discussions and emerging statements of common ground.

Site Level Exceptional Circumstances

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 Topic Paper, site level Green Belt assessment (set out in Green Belt Study Part 4) and master planning undertaken for the sites.
- 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 Topic Paper, site level Green Belt assessment (set out in Green Belt Study Part 4) and master planning undertaken for the sites.

Green Belt and Broad Distribution

- 5.15 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.
- 5.16 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.
- 5.17 The Green Belt Study Part 1 (& subsequent Assessments through Parts 2-4) undertaken by Arup on behalf of the Council has also informed the broad distribution of development, alongside other strategic factors including settlement hierarchy.

Safeguarded Land

- 5.18 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;

- 5.19 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.
- 5.20 A study⁴ was undertaken on behalf of the Council by Arup to assess the need for safeguarded land for housing and employment uses. 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.
- 5.21 The proposed spatial strategy for employment and allocation of sites may deliver a supply of employment land which will endure beyond the plan period. There is also significant uncertainty in robustly establishing what employment land needs will be post 2040. On this basis it is concluded there is no need to safeguard land between the urban area and the Green Belt for employment.

Distribution by Functional Economic Market Area

- 5.22 The Functional Economic Market Area includes the local authority areas of Newcastle-under-Lyme Borough and Stoke-on-Trent City Council. Through the preparation of the respective local plans for Newcastle-under-Lyme and Stoke-on-Trent City Council the objectively assessed employment land needs of the FEMA will be addressed. Newcastle-under-Lyme will plan the level of employment land need for the borough identified in the HENA (2024).

Settlement Hierarchy

- 5.23 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

⁴ Green Belt Safeguarded Land Advice (Assessing the need for Safeguarded Land) Arup, May 2024

of Kidsgrove where there is good access to the widest range of services, facilities, and public transport.

Strategic Centres

- 5.24 **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 employment and housing growth in the Borough.

Urban Centres

- 5.25 **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

- 5.26 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.
- 5.27 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.
- 5.28 The employment land requirement for the Borough can be accommodated in and adjacent to 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.

Other Settlements and Rural Areas

- 5.29 The remaining settlements in the rural area comprise smaller villages with limited facilities and infrastructure to support strategic scale growth. Smaller scale employment growth in the wider rural area can be delivered through the mechanisms of community led development and Neighbourhood Plans. The

Local Plan will not propose allocations for settlements within this tier of the settlement hierarchy.

Establishing Spatial Strategy Options

5.30 The following section of the topic paper sets out the broad employment distribution and site options that were considered through consultation on the Issues and Strategic Options (2022), the First Draft Local Plan (Regulation 18, 2023) and how this has informed the preferred strategy for the Regulation 19 Local Plan. Employment growth options considered in the preparation of the local plan have been informed by strategic factors including employment land need, broad distribution factors and settlement hierarchy. In terms of bottom-up factors, employment site options were appraised through the site selection process and SA which is set out in the Site Selection Topic Paper (2024) and Regulation 19 SA Report (2024).

Issues and Options (2022)

5.31 This consultation was informed by the 2020 Housing and Economic Needs Assessment. At this point the evidence suggested that existing employment land supply may be sufficient to provide for employment land need identified in the HENA (2020). However, the 2020 HENA identified qualitative deficiencies in the quality and location of employment land to meet needs over the plan period which would necessitate the allocation of new employment sites to meet need.

Table 1 Issues and Options Employment Growth Options (2020)

Option	Need (hectares)	Supply (hectares)	Total Requirement (surplus)
1 Nationally Set	46.8	64.8	+18
2 Sustainable Growth	52.6	64.8	+12.2
3. Greater Job Growth	56.6	64.8	+8.2

5.32 Employment land supply identified at this stage was approximately 64.8 hectares but this supply has subsequently depleted as reflected in the 2024 HENA.

5.33 Option 1 ‘Nationally set’ relates to the level of employment land growth required to support housing delivery based on the standard method. Options 2 and 3 relate to the economic growth scenarios identified in the 2020 HENA (Experian and Experian plus growth scenarios).

5.34 At this consultation stage a specific employment land spatial strategy and associated allocations were not presented for consultation. However, the

consultation sought views on the principle of allocating strategic employment sites with consideration of the following employment site options.

- **AB2 – Land adjoining corner of A500 and M6 southbound**
- **KL15 – Land South of A525 between Keele University and Newcastle**

Conclusions for Spatial Strategy

5.35 Following this consultation stage and in relation to the published HENA (2020) it was concluded that Option 1 –Nationally Set would be taken forward. This employment growth scenario aligned with the standard method housing requirement (350 homes per annum and 7,000 homes over the plan period). At this time Option 1 aligned with the Government’s standard method, economic jobs forecasts (HENA, 2020) and was considered the most deliverable option in terms of site opportunities.

First Draft Local Plan (Regulation 18, 2023)

5.36 This consultation stage was informed by the Housing and Economic Development Needs Assessment update (2023). At this stage Policy PSD1 identified a minimum requirement for the local plan to provide for 69 hectares of employment land over the plan period to 2040. This was balanced against identified employment land supply of approximately 50 hectares.

5.37 The employment growth strategy and provision of 69 hectares aligned with the housing strategy based on the standard method and the creation of 269 jobs per annum over the plan period to 2040.

5.38 At this stage a spatial strategy and distribution of development was published including new employment allocations. This consultation stage also considered the **principle (only)** for the potential allocation of strategic employment sites and views were sought on the following sites:

- **AB2 – Land adjoining corner of A500 and M6 southbound**
- **KL15 – Land South of A525 between Keele University and Newcastle**
- **TK30 – Land off Talke Road and A500, Talke**

5.39 **Appendix 2** of the consultation document identified employment land supply to provide for the employment land requirement with consideration given to the potential allocation of one or more strategic employment sites to address development needs including needs of key growth sectors. Employment land supply included existing established employment sites and proposed allocations in the existing urban area. In addition to this supply, options for potential strategic employment sites in the Green Belt (AB2, KL15 and TK30) were considered.

Assessment of Site Options

- 5.40 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.
- 5.41 The full site selection process, consideration of all sites and methodology is set out in the Site Selection Topic Paper (2024) and the Regulation 19 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.
- 5.42 The Green Belt Studies have also 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.

Consideration of Reasonable Alternative Growth Scenarios

- 5.43 At this stage existing employment land and supply identified through promoted through the SHELAA and local plan consultation stages was identified. Reasonable alternative growth options for employment mainly relate to the consideration of strategic employment sites. The principle only of potentially allocating strategic employment sites (i.e. AB2, KL15 and TK30) was undertaken at this stage. Responses to the consultation, key evidence, and SA would inform further work on reasonable alternatives following the Regulation 18 consultation to inform the Regulation 19 Plan.

Conclusions for Spatial Strategy

- 5.44 Following the Regulation 18 consultation stage the following conclusions were established to inform preparation of the Regulation 19 Plan.
- **Development Quantum:** Following this consultation stage, a further HENA update (2024) would be undertaken to inform the local plan housing and employment land requirement. This would determine if a higher level of housing and employment land is required in relation to an economic growth scenario.
 - **Reasonable Alternative Growth Scenarios:** Further work would be undertaken on RAs for employment factoring in growth scenario options relating to the strategic employment site options.

- **Strategic Employment Sites:** Following the consultation it was concluded that there is a need to provide for potentially 2 strategic employment sites to provide for qualitative and quantitative employment land needs, sub regional growth aspirations and the needs of key growth sectors.

Establishing the Regulation 19 Employment Spatial Strategy

Employment Quantum

- 5.45 The HENA identified a projected need for between 43.1ha and 83 ha of employment land for use classes E(g) (I, II, II), B2 and B8 over the plan period to 2040. The Regulation 19 local plan employment spatial strategy is based on providing for this level of need which is also in line with the housing strategy delivering 400 homes and 237 jobs per annum.

Site Selection

- 5.46 Following the Regulation 18 consultation further work has been undertaken on site selection. This has mainly been focussed on the consideration of strategic employment site options following the confirmation of supply on existing sites within the urban area. 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 employment 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.

Further Consideration of Reasonable Alternatives (Regulation 19)

- 5.47 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. The identification of reasonable alternatives is based around new proposed employment allocations including strategic employment sites. Table 2 set out reasonable alternative growth scenarios identified for appraisal through SA at this stage.

Table 2 Reasonable Alternative Growth Scenarios (Regulation 19)

	Growth Scenario 6a	Growth Scenario 6b Preferred Option	Growth Scenario 6c	Growth Scenario 6d
Employment Land in Supply (constant in site options)	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)	BW1 Chatterley Valley (6.499) CT20 Rowhurst Close (7.51) KL13 Keele Science Park (Phase 3) (11) TC45 York Place (0.29) TC7 Ryecroft (1.63)
Strategic Employment Sites	<ul style="list-style-type: none"> No Strategic Sites 	AB2 Land adjoining corner of A500 and M6 Southbound (22ha)	AB2 Land adjoining corner of A500 and M6 Southbound (22ha)	KL15 Land South of A525 between Keele University and Newcastle (13ha)
		KL15 Land South of A525 between Keele University and Newcastle (13ha)	TK30 Land off Talke Road and A500, Talke (51ha)	TK30 Land off Talke Road and A500, Talke (51ha)
Total Existing Employment Land Supply	48.9ha	48.9ha	48.9ha	48.9ha
Total employment Land Supply (including allocations)	69.6	104.6	142.6	133.6
Local Plan Employment Land Requirement	63ha minimum	63ha minimum	63ha minimum	63ha minimum
Commentary	<ul style="list-style-type: none"> Extent to which it meets employment land requirements? Extent to which this option fits with the vision and objectives of the Plan Does not support Keele Science Corridor 	<ul style="list-style-type: none"> Keele Science Corridor 	<ul style="list-style-type: none"> Development on the A500 corridor 	<ul style="list-style-type: none"> Development on the A500 corridor

Preferred Employment Spatial Strategy (Regulation 19)

- 5.48 The preferred employment spatial strategy has been informed by SA / HRA, the evidence base, the site selection process, responses to the previous consultation stages, and ongoing engagement with key stakeholders and site promoters.
- 5.49 Option 6b is the preferred growth scenario. This scenario performed best through SA and in relation to the HENA and Strategic Sites Study (2024). This scenario is capable of providing for the objectively assessed need for employment land and gives resilience in supply to ensure needs are met over the plan period to 2040. From a qualitative perspective this scenario is also capable of providing for the needs of key employment sectors including large scale logistics (AB2) and knowledge based uses directly associated with Keele University (KL15).
- 5.50 Option 6a is unpreferred as this scenario does not include strategic employment sites which are required to meet growth aspirations for key sectors including logistics and knowledge-based uses associated with the University of Keele Growth Corridor.
- 5.51 Option 6c is unpreferred due to delivery concerns associated with site TK30. Also, this scenario would not support the growth aspirations for the University of Keele and the University Growth Corridor.
- 5.52 Option 6d is unpreferred as it includes site TK30 which has deliverability concerns as outlined in the Strategic Employment Sites Report (Aspinall Verdi, 2024).

Table 3 Preferred Employment Growth Scenario (Regulation 19)

	Growth Scenario 6B	Land Supply (hectares)
Local Plan Employment Land Requirement	Minimum 63ha	
Employment Land in Supply Allocations	BW1 Chatterley Valley	6.5
	CT20 Rowhurst Close	7.5
	• KL13 Keele Science Park (Phase 3)	11
	• TC45 York Place	0.29
	• TC7 Ryecroft	1.63
Strategic Employment Site Allocations	AB2 Land adjoining corner of A500 and M6 Southbound	22
	KL15 Land South of A525 between Keele University and Newcastle	13

Total employment Land Supply (including allocations)		104.6
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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'.