

# Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan Issues Consultation and Responses Document

Working together to shape the future of our area



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## **Introduction**

- 1.1 The Joint Local Plan Issues Consultation Document was subject to consultation between the 15<sup>th</sup> February and the 29<sup>th</sup> March 2016. The main report was supported by a summary guide, eight strategic Issues technical papers and a number of key evidence based documents.
- 1.2 This report sets out all of the consultation responses received during the consultation and provides an initial response from Planning Officers as to how the comments will be taken forward in the Joint Local Plan production.
- 1.3 A total of 82 representations were received as a result of the consultation providing over 600 separate comments for the individual themes set out in the document. Representations have been received from a variety of consultees including developers, land owners, housing associations, universities and individual members of the public.
- 1.4 Since the consultation on the Issues Consultation Document work has continued to progress and additional pieces of evidence and research has been conducted in order to feed into Strategic Options.

## Schedule of Comments – Issues Consultation Introduction

Reference	Section/ Paragraph Number	Consultee	Consultee Comments	Officer Comments
IC046/371	Para 1.15	Cheshire East	That the Government's proposals for HS2 have not been taken into account in the Joint Local Plan process at this stage	As the government's proposals for HS2 become clearer this will be taken into consideration as part of the Joint Local Plan, as appropriate.
IC052/409	Para 1.15	NFU	Further consideration needs to be given to the impact of HS2 on farms and rural businesses. Many of the affected farmers will lose agricultural buildings and some will even lose their homes. Therefore the Local plan process needs to give consideration to the need for replacement agricultural buildings. In some cases this could include the development of new farmsteads with associated infrastructure and a new farmhouse. Farms that retain buildings but are affected by severance may also need new buildings and farm infrastructure.	As the government's proposals for HS2 become clearer this will be taken into consideration as part of the Joint Local Plan, as appropriate.
IC011/134	Para 1.30	Thistleberry Residents Association	The evidence base seems to be generally out of date and we do not appear to know about any of the recent studies that might have been undertaken. We would like to see copies of these – the Newcastle Retail Leisure Study and the Gypsies and Travellers Needs Assessment	<p>The Joint Local Plan is being developed based on the production of robust evidence. This evidence will be published alongside each stage of the plan production and is available on the councils websites</p> <p>The Issues Consultation document included evidence from an up to date Strategic Housing Market Assessment; Employment Land Review and Joint Gypsy and Traveller Accommodation Needs Assessment . The evidence base for the Joint Local Plan</p>
IC011/135	Para 1.33	Thistleberry Residents Association	We would like to know how both LAs intend to increase the economy by 50 per cent over the lifetime of the Plan. Is this a conservative or aspirational target? We would also like to know how this is to be done and which areas	No decisions have been made at this stage. The Spatial Options document will set out the options for growth for the Joint Local Plan area and provide an opportunity for

			of the economy are to be enlarged/encouraged/developed etc.. and in which geographical areas	comment on these options.
IC022/230	Para 1.34	Joan Walley	I have concerns especially in relation to the housing proposals that to date there has been insufficient collaboration with Staffordshire Moorlands Council. I accept that this is a joint plan between Stoke on Trent and Newcastle under Lyme. However SMDC is currently consulting on a SHA , and has proposed options which would mean incursion into its green belt. It would be far better for there to be some agreement with SOT and Nu L councils to adopt a sequential approach to the development of brown field first. This would be in the mutual interests of all authorities. I understand that detailed discussions on this have not taken place. A similar concern exists in that significant parts of Cheshire's green belt could be developed in preference to brown field sites in the Staffordshire conurbation.	The National Planning Policy Framework requires authorities, through the Duty to Co-operate requirement, to discuss their strategies and plans with adjoining authorities. Stoke-on-Trent and Newcastle-under-Lyme Borough Council and been and will continue to liaise with surrounding authorities, including Staffordshire Moorlands District Council and Cheshire East Council, throughout the plan making process. This will be set out within a consultation statement.
IC066/495	Para 1.34	Elena Sudlow (Maer & Acton Parish Council)	We would be pleased if all our neighbouring councils, including Cheshire and Shropshire are to be consulted on this document.	Noted. All surrounding authorities including those in Cheshire and Shropshire have been and will continue to be consulted on each Joint Local Plan stage, in line with the adopted Statement of Community Involvement.
IC072/550	Para 1.34	Dean Lewis (Tim Dean)	A proportion of the unmet housing needs of Cheshire East may also be exported into Stoke-on-Trent City Council and Newcastle-Under-Lyme. This is a crucial factor that should be properly addressed within the evolution of the spatial strategy of the Local Plan. Under the auspices of the duty to cooperate, and having regard to the evidence, the most sustainable way of accommodating unmet housing needs of East Cheshire would be locating development in order that it shares a functional relationship with Cheshire East whilst also supporting sustainable growth of Newcastle-Under-Lyme. Dean Lewis Estates will wish to see clear evidence that Stoke-on-Trent City Council and Newcastle-Under-Lyme	Noted. The National Planning Policy Framework requires authorities, through the Duty to Co-operate requirement, to discuss their strategies and plans with adjoining authorities. Stoke-on-Trent and Newcastle-under-Lyme Borough Council will liaise with surrounding authorities, including Staffordshire Moorlands District Council and Cheshire East Council, throughout the plan making process. This will be set out within a consultation statement.

			has executed its' duty to cooperate by working with other neighbouring authorities in order to address the cross boundary strategic issue of unmet housing and employment needs.	
IC005/19	Para 1.36 Next Steps	St Modwens	<p>It is initially noted that there does not appear to be an overarching vision or strategy for the joint authority area. Whilst numerous topic-specific aspirations are borne out within each of the chapters, there does not appear to be a strategic vision or objectives for what the Councils, and this consultation document are setting out to achieve.</p> <p>2.2 This is a considerable omission as it is evident that Stoke and Newcastle is in need of significant investment to stimulate the employment and housing markets. This point is highlighted in many of the chapters as well as the evidence base. There needs to be a key consideration as to how high value economy and population can be both secured and retained within the joint area. By not setting out an overall vision for the document at this stage it is not possible to weigh all the issues against each other. There appear to be many "minor" issues that have been identified within the document, but by not including an overarching vision for the area it is not possible to comparatively assess the issues.</p> <p>2.3 It is strongly recommended that a high-level vision or aim, focussing on attracting and retaining high quality employment and population is set out to help focus the issues and help in identifying what will support this aim and what will conflict.</p>	Noted. The Plans Vision, Aims and Objectives will be set out within the Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document.
IC008/39	Para 1.36 Next Steps	Natural England	<p>Natural England notes that the current issues report does not seek to address these as they are programmed for development at a later stage in the process. We look forward to the development of this essential element of the joint local plan and would draw the Councils' attention to the cross-cutting nature of natural environment related themes which we offer advice on below.</p> <p>Natural England advises that the Plan's vision and emerging development strategy should address impacts</p>	Comments Noted.

			and opportunities for the natural environment with particular emphasis on designated environmental assets. The plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity. Where relevant there should be linkages with the Staffordshire Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans and relevant Green Infrastructure Strategies.	
IC009/55	Para 1.36 Next Steps	Councillor Derek R Davies - NDP Steering Group	<p>There is a complete lack of vision in terms of identifying issues. There needs to be transformative change across both the urban and rural areas. The environment of 2033 will look very different to the areas of today. The technologies and constraints are largely already known and this document takes us nowhere near the direction that we need to move in.</p> <p>The plan area has suffered three decades of decline and this document does nothing to address ways in which this decline can be reversed and the area can be moved towards a credible future vision.</p> <p>There is no vision in terms of regeneration and movement towards the future; making the area a place where people will want to live and work; and understanding of what the future will look like.</p> <p>There seems to be no plan or desire to redevelop brownfield sites.</p> <p>The urban part of the plan area suffers from the legacy of its industrial past. There is too much focus on this legacy in the document at the expense of future vision. The area needs transformative change in order to survive and prosper into the future.</p>	Noted. The Plans Vision, Aims and Objectives will be set out within the Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document. Going forward the Sustainability Appraisal (SA) will work to assess the impact of each of the Joint Local Plan objectives and proposals on the sustainability objectives set out in the SA Scoping Report. This will identify adjustments that need to be made to policies in order to achieve a positive impact if at all possible and identify any required mitigation measures.
IC022/229	Para 1.36 Next Steps	Joan Walley	My initial comments are that the combined technical papers and summary of the 8 chosen key strategic	Noted. The Plans Vision, Aims and Objectives will be set out within the

		<p>themes do not add up to a clear vision for future development across Stoke on Trent and Newcastle under Lyme.</p> <p>I suggest that an overarching strategy and vision needs to be set out at the outset, and that further work is required to finalise this using expertise which is both knowledgeable about local issues and can address the economic challenges within the context of the UN Paris Agreement on climate change and government commitments for a 25 year plan on natural capital.</p> <p>Having read through the technical papers on the subject matters, these appear to be out of date in some cases, lacking in knowledge about basic local matters and fragmented and piecemeal rather than mutually supportive of how to embed sustainability issues and long term objectives across a range of policy areas.</p> <p>I believe that the vision for the administrative areas should be to have a competitive edge to ensure new infrastructure, new build /refurbishment , and connectivity within and outside the Plan area is consistent with the embedding of sustainability values underpinning all policy areas. That would include addressing rising inequality in our area compared to other parts of the UK. I would like to see this as a strategic aim, and one that better reflects the Health and Well Being objectives.</p> <p>The Plan should therefore be further reviewed at this stage to reflect such a cross cutting approach.</p> <p>In the case of Stoke on Trent such changes could also make it consistent with the proposed City of Culture bid where government guidelines suggest that bids should be integral with broader strategic objectives.</p> <p>Rather than have eight separate stand alone objectives</p>	<p>Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document.</p>
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			<p>the Plan should show how climate change and natural capital considerations should underpin all other policy areas. There should be stated objectives relating to biodiversity, at the very minimum no net loss, but ideally a more ambitious proposal. Achieving this will depend on changes within the areas of policy, including for example prioritising water quality and air quality. For example achieving water quality standards in the Trent and other water courses should be a key objective. As well as focusing on the impotence of green spaces, and connectivity between them, there should be a commitment to meet European air quality standards, and housing and transport policy need to be adapted accordingly.</p> <p>More detailed work needs to be done at this stage to identify how to avoid inappropriate development in the urban area.</p>	
IC025/257	Para 1.36 Next Steps	Barratts Developments PLC	<p>Given that the preparation of a Neighbourhood Plan is less onerous in terms of the evidence required, and is a less time consuming exercise than the preparation of a Local Plan, the two local authorities, and in particular, Newcastle-under-Lyme Borough Council (who have more villages and other rural settlements within their local authority area) must have a clear strategy in place to guide Neighbourhood Plans where the relevant Neighbourhood Areas are designated.</p> <p>5.4 In particular, the two authorities should quickly devise their strategy following the next round of consultation on the Local Plan, and seek to work with Neighbourhood Areas to develop any Neighbourhood Plans that may come forward in tandem with the Local Plan in order to ensure that there are no policy conflicts between any Neighbourhood Plans at a local level, and the Local Plan at the strategic level.</p> <p>5.5 The Local Plan going forward must set out a clear policy on the delivery of housing in and around villages, and rather than applying a housing policy of delivering a</p>	<p>Noted. The Strategic Options document will identify the sub-areas and character areas for the Joint Local Plan. The purpose of these areas is to ensure that the Plans Vision, Aims and Objectives are identifiable by local neighbourhoods.</p> <p>The Strategic Options Document will also set out options for the delivery of housing across the plan area and sub-areas.</p>

			particular number of dwellings across the rural area, or identifying a particular number of dwellings across the larger rural service centres. Once the full objective assessment of housing needs has been robustly established, a specific minimum number of dwellings to be delivered in and around each settlement should be identified to provide more certainty to both local communities and developers. The Local Plan should also be clear as to whether or not the minimum numbers allocated to each settlement can be exceeded, and the policy requirements/criteria that would need to be addressed in such locations in the event, for example, that the LPA cannot demonstrate a 5 year housing land supply, or additional developable sites come forward that are otherwise suitable and sustainable in planning terms in order to ensure that housing sites continually come forward to meet objectively assessed housing needs and to ensure a robust deliverable housing land supply at all times throughout the plan period.	
IC028/280	Para 1.36 Next Steps	Henry Davidson	The Local Plan should provide a positive context for this investment in the future and HDD wishes to work closely with the Council to ensure that the policy reflects the joint ambitions for the Ryecroft site.	Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses, in line with the adopted Statement of Community Involvement.
IC032/295	Para 1.36 Next Steps	United Utilities	When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.	Noted. An Infrastructure Delivery Plan will be prepared as the Joint Local Plan progresses which will address the issues addressed and can be developed as the development locations are identified at the Draft Plan stage.
IC032/296	Para 1.36 Next Steps	United Utilities	United Utilities wishes to highlight that we will seek to work closely with both the Borough and City Councils ("the Council") during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to	Noted.

			local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Joint Local Plan.	
IC032/297	Para 1.36 Next Steps	United Utilities	<p>One of the roles of the Joint Local Plan will be to allocate sites to deliver specific types of development. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection. Once more information is available with respect to specific development sites, which is often only at planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy and can advise on an appropriate wording.</p> <p>Please note that United Utilities seeks to undertake further discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once it has identified its preferred site allocations. In your selection criteria, we would encourage the Council to consider the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to the public sewer</p>	<p>Comments Noted. We will continue to work with stakeholders in the production of robust Joint Local Plan policies as the plan progresses to Draft Plan stage. Consideration will be given to preparing a Water Cycle Study.</p>
IC032/299	Para 1.36 Next Steps	United Utilities	<p>With regards to large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.</p>	<p>Comments Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses in line with the Statement of Community Involvement.</p>

			<p>We encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy. On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning.</p> <p>Whilst we appreciate the Council has yet to identify any potential development sites as part of the Local Plan process, we strongly recommend this is addressed in advance of allocating specific sites.</p>	
IC033/303	Para 1.36 Next Steps	Severn Trent Water	<p>STW's is generally supportive of the approach taken by the joint authorities to evidence gathering and identification of key issues that will need to be taken into account in the preparation of the Joint Local Plan. However, it is difficult at this stage to provide detailed comments until such time as the Strategic Options, informed by the Strategic Housing Land Availability Assessment (SHLAA) other evidence base documents, is published setting out the proposed development strategy. In light of this, this representation provides only very general comments</p>	Support Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses in line with the Statement of Community Involvement.
IC062/446	Para 1.36 Next Steps	Marshall Fear	<p>Although we understand that the Local Plan is an ever evolving document, it is of concern that the current draft sent out for consultation does not take into account the following:</p> <ul style="list-style-type: none"> <li>- The Housing and Planning Act 2015</li> <li>- HS2 and its potential positive/negative benefits (Described by your former leader as a "Game changer"</li> <li>- The Northern Gateway Initiative and in particular the opportunity this presents to</li> </ul> <p>adopt a more sensible regional approach to development across the wider area including sharing of the numbers of</p>	<p>The Joint Local Plan will take into account statutory legislation, as appropriate, as this is a key component of the soundness test as examination. Land availability and infrastructure requirements will be set out as the Joint Local Plan processes to draft plan stage.</p> <p>In terms of HS2 as the government's proposals for HS2 become clearer this will be taken into consideration as part of the</p>

			<p>properties to be developed as part of the 5 year land supply</p> <ul style="list-style-type: none"> <li>- Planning Policy Matters such as land availability and infrastructure demands</li> </ul> <p>Given the importance and potential significant effect on the plan, would it not have been better to have taken these issues into account prior to consultation?</p>	<p>Joint Local Plan, as appropriate.</p> <p>Initiatives such as the Northern Gateway Development Zone are not at a sufficiently advanced stage to be able to take into account at this stage. If evidence becomes available, and is considered to be relevant, the Joint Local Plan will need to consider the weight or any impact of such initiatives on the Joint Local Plan policies and proposals.</p>
IC062/451	Para 1.36 Next Steps	Marshall Fear	<p>The Core Spatial Strategy was written to address a number of Strategic Aims relating to housing but it is unclear how the Local Plan will address these issues which still remain.</p>	<p>The Strategic Options Document will set out the options for addressing the Issues and Challenges of the area, this will include, as one of the options, identification of the current Core Spatial Strategy and whether this strategy should continue.</p>
IC072/551	Para 1.36 Next Steps	Dean Lewis (Tim Dean)	<p>Section 19 of the 2004 Planning and Compulsory Purchase Act, requires that Local Plans are tested by way of a Sustainability Appraisal (SA), thereby meeting the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The SA should be carried out at each stage of the Plan's preparation. It is not clear that Stoke-on-Trent City Council and Newcastle-Under-Lyme has undertaken an SA on the Issues and Options. If this is not the case, then we would urge that one is undertaken as matter of expediency and the results made publicly available at the earliest opportunity.</p>	<p>The councils have prepared a Sustainability Appraisal Scoping Report, in line with the National Planning Policy Framework. Sustainability Appraisal will be undertaken at the Spatial Options Stage. This issues consultation only aims to identify the issues which the Joint Local Plan will need to address and does not, at this stage, present any options for addressing these, therefore a sustainability appraisal is not considered to be required for the Issues Consultation.</p>
IC072/552	Para 1.36 Next Steps	Dean Lewis (Tim Dean)	<p>The 'Vision' for Stoke-on-Trent City Council and Newcastle-Under-Lyme Borough Local Plan should be ambitious. It should recognise the needs of its' diverse community as the underpinning principle of its purpose. It should also recognise and face up to the challenges that have led to historic social deprivation, economic under performance and poor environmental conditions.</p>	<p>Noted. The Plans Vision, Aims and Objectives will be set out within the Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document.</p>
IC072/566	Para 1.36 Next Steps	Dean Lewis (Tim Dean)	<p>Dean Lewis Estates notes that I&amp;O does not directly deal with the fundamental matter deliverability of the plan.</p>	<p>Comments noted.</p>

			<p>In our view, a disproportionately high reliance on urban brownfield development will result in significant under delivery of the plan.</p> <p>Deliverability of previously developed sites should be thoroughly tested, not only in terms of viability, but in terms of compatibility of use. The longer gestation period for such sites to legitimately be in a position of deliverability should also be factored into the timescales for successful implementation of the plan.</p> <p>The Local Plan must acknowledge that PDL is not sufficiently available or deliverable to enable successful delivery of all of the needs of plan up to 2033.</p> <p>A portfolio of different types of sites, spread across Stoke-on-Trent and Newcastle-Under-Lyme will be necessary to provide the greatest chance of success of Council meeting its development needs sustainably.</p> <p>Funding procured from developments should be structured so as to aid cash flow of developers in order to significantly boost delivery rates. This approach provides a realistic and more robust strategy for successful and timely delivery of essential infrastructure. Requiring weighty upfront payments or payments too early on in the development of sites will impede growth. A policy in respect of infrastructure should enshrine this concept to ensure successful delivery.</p>	
IC081/618	Para 1.36 Next Steps	Celia Richie	<p>To date, building is planned in Newcastle to accommodate 955 students, some of which I am sure will have cars adding to the pollution. Stoke on Trent is to have more students from Stafford. Has the extra strain on medical/hosp services been taken into account?</p>	<p>The policies and proposals in the Joint Local Plan will be supported by an Infrastructure Delivery Plan which will consider the impact on local service provision.</p>

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IC008/39	Para 1.36 Next Steps	Natural England	<p>Natural England notes that the current issues report does not seek to address these as they are programmed for development at a later stage in the process. We look forward to the development of this essential element of the joint local plan and would draw the Councils' attention to the cross-cutting nature of natural environment related themes which we offer advice on below.</p> <p>Natural England advises that the Plan's vision and emerging development strategy should address impacts</p>	Comments Noted.

			and opportunities for the natural environment with particular emphasis on designated environmental assets. The plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity. Where relevant there should be linkages with the Staffordshire Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans and relevant Green Infrastructure Strategies.	
IC009/55	Para 1.36 Next Steps	Councillor Derek R Davies - NDP Steering Group	<p>There is a complete lack of vision in terms of identifying issues. There needs to be transformative change across both the urban and rural areas. The environment of 2033 will look very different to the areas of today. The technologies and constraints are largely already known and this document takes us nowhere near the direction that we need to move in.</p> <p>The plan area has suffered three decades of decline and this document does nothing to address ways in which this decline can be reversed and the area can be moved towards a credible future vision.</p> <p>There is no vision in terms of regeneration and movement towards the future; making the area a place where people will want to live and work; and understanding of what the future will look like.</p> <p>There seems to be no plan or desire to redevelop brownfield sites.</p> <p>The urban part of the plan area suffers from the legacy of its industrial past. There is too much focus on this legacy in the document at the expense of future vision. The area needs transformative change in order to survive and prosper into the future.</p>	Noted. The Plans Vision, Aims and Objectives will be set out within the Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document. Going forward the Sustainability Appraisal (SA) will work to assess the impact of each of the Joint Local Plan objectives and proposals on the sustainability objectives set out in the SA Scoping Report. This will identify adjustments that need to be made to policies in order to achieve a positive impact if at all possible and identify any required mitigation measures.
IC022/229	Para 1.36 Next Steps	Joan Walley	My initial comments are that the combined technical papers and summary of the 8 chosen key strategic	Noted. The Plans Vision, Aims and Objectives will be set out within the

		<p>themes do not add up to a clear vision for future development across Stoke on Trent and Newcastle under Lyme.</p> <p>I suggest that an overarching strategy and vision needs to be set out at the outset, and that further work is required to finalise this using expertise which is both knowledgeable about local issues and can address the economic challenges within the context of the UN Paris Agreement on climate change and government commitments for a 25 year plan on natural capital.</p> <p>Having read through the technical papers on the subject matters, these appear to be out of date in some cases, lacking in knowledge about basic local matters and fragmented and piecemeal rather than mutually supportive of how to embed sustainability issues and long term objectives across a range of policy areas.</p> <p>I believe that the vision for the administrative areas should be to have a competitive edge to ensure new infrastructure, new build /refurbishment , and connectivity within and outside the Plan area is consistent with the embedding of sustainability values underpinning all policy areas. That would include addressing rising inequality in our area compared to other parts of the UK. I would like to see this as a strategic aim, and one that better reflects the Health and Well Being objectives.</p> <p>The Plan should therefore be further reviewed at this stage to reflect such a cross cutting approach.</p> <p>In the case of Stoke on Trent such changes could also make it consistent with the proposed City of Culture bid where government guidelines suggest that bids should be integral with broader strategic objectives.</p> <p>Rather than have eight separate stand alone objectives</p>	<p>Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document.</p>
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			<p>the Plan should show how climate change and natural capital considerations should underpin all other policy areas. There should be stated objectives relating to biodiversity, at the very minimum no net loss, but ideally a more ambitious proposal. Achieving this will depend on changes within the areas of policy, including for example prioritising water quality and air quality. For example achieving water quality standards in the Trent and other water courses should be a key objective. As well as focusing on the impotence of green spaces, and connectivity between them, there should be a commitment to meet European air quality standards, and housing and transport policy need to be adapted accordingly.</p> <p>More detailed work needs to be done at this stage to identify how to avoid inappropriate development in the urban area.</p>	
IC025/257	Para 1.36 Next Steps	Barratts Developments PLC	<p>Given that the preparation of a Neighbourhood Plan is less onerous in terms of the evidence required, and is a less time consuming exercise than the preparation of a Local Plan, the two local authorities, and in particular, Newcastle-under-Lyme Borough Council (who have more villages and other rural settlements within their local authority area) must have a clear strategy in place to guide Neighbourhood Plans where the relevant Neighbourhood Areas are designated.</p> <p>5.4 In particular, the two authorities should quickly devise their strategy following the next round of consultation on the Local Plan, and seek to work with Neighbourhood Areas to develop any Neighbourhood Plans that may come forward in tandem with the Local Plan in order to ensure that there are no policy conflicts between any Neighbourhood Plans at a local level, and the Local Plan at the strategic level.</p> <p>5.5 The Local Plan going forward must set out a clear policy on the delivery of housing in and around villages, and rather than applying a housing policy of delivering a</p>	<p>Noted. The Strategic Options document will identify the sub-areas and character areas for the Joint Local Plan. The purpose of these areas is to ensure that the Plans Vision, Aims and Objectives are identifiable by local neighbourhoods.</p> <p>The Strategic Options Document will also set out options for the delivery of housing across the plan area and sub-areas.</p>

			particular number of dwellings across the rural area, or identifying a particular number of dwellings across the larger rural service centres. Once the full objective assessment of housing needs has been robustly established, a specific minimum number of dwellings to be delivered in and around each settlement should be identified to provide more certainty to both local communities and developers. The Local Plan should also be clear as to whether or not the minimum numbers allocated to each settlement can be exceeded, and the policy requirements/criteria that would need to be addressed in such locations in the event, for example, that the LPA cannot demonstrate a 5 year housing land supply, or additional developable sites come forward that are otherwise suitable and sustainable in planning terms in order to ensure that housing sites continually come forward to meet objectively assessed housing needs and to ensure a robust deliverable housing land supply at all times throughout the plan period.	
IC028/280	Para 1.36 Next Steps	Henry Davidson	The Local Plan should provide a positive context for this investment in the future and HDD wishes to work closely with the Council to ensure that the policy reflects the joint ambitions for the Ryecroft site.	Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses, in line with the adopted Statement of Community Involvement.
IC032/295	Para 1.36 Next Steps	United Utilities	When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.	Noted. An Infrastructure Delivery Plan will be prepared as the Joint Local Plan progresses which will address the issues addressed and can be developed as the development locations are identified at the Draft Plan stage.
IC032/296	Para 1.36 Next Steps	United Utilities	United Utilities wishes to highlight that we will seek to work closely with both the Borough and City Councils ("the Council") during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to	Noted.

			local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Joint Local Plan.	
IC032/297	Para 1.36 Next Steps	United Utilities	<p>One of the roles of the Joint Local Plan will be to allocate sites to deliver specific types of development. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection. Once more information is available with respect to specific development sites, which is often only at planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy and can advise on an appropriate wording.</p> <p>Please note that United Utilities seeks to undertake further discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once it has identified its preferred site allocations. In your selection criteria, we would encourage the Council to consider the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to the public sewer</p>	<p>Comments Noted. We will continue to work with stakeholders in the production of robust Joint Local Plan policies as the plan progresses to Draft Plan stage. Consideration will be given to preparing a Water Cycle Study.</p>
IC032/299	Para 1.36 Next Steps	United Utilities	<p>With regards to large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.</p>	<p>Comments Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses in line with the Statement of Community Involvement.</p>

			<p>We encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy. On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning.</p> <p>Whilst we appreciate the Council has yet to identify any potential development sites as part of the Local Plan process, we strongly recommend this is addressed in advance of allocating specific sites.</p>	
IC033/303	Para 1.36 Next Steps	Severn Trent Water	<p>STW's is generally supportive of the approach taken by the joint authorities to evidence gathering and identification of key issues that will need to be taken into account in the preparation of the Joint Local Plan. However, it is difficult at this stage to provide detailed comments until such time as the Strategic Options, informed by the Strategic Housing Land Availability Assessment (SHLAA) other evidence base documents, is published setting out the proposed development strategy. In light of this, this representation provides only very general comments</p>	Support Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses in line with the Statement of Community Involvement.
IC062/446	Para 1.36 Next Steps	Marshall Fear	<p>Although we understand that the Local Plan is an ever evolving document, it is of concern that the current draft sent out for consultation does not take into account the following:</p> <ul style="list-style-type: none"> <li>- The Housing and Planning Act 2015</li> <li>- HS2 and its potential positive/negative benefits (Described by your former leader as a "Game changer"</li> <li>- The Northern Gateway Initiative and in particular the opportunity this presents to</li> </ul> <p>adopt a more sensible regional approach to development across the wider area including sharing of the numbers of</p>	<p>The Joint Local Plan will take into account statutory legislation, as appropriate, as this is a key component of the soundness test as examination. Land availability and infrastructure requirements will be set out as the Joint Local Plan processes to draft plan stage.</p> <p>In terms of HS2 as the government's proposals for HS2 become clearer this will be taken into consideration as part of the</p>

			<p>properties to be developed as part of the 5 year land supply</p> <ul style="list-style-type: none"> <li>- Planning Policy Matters such as land availability and infrastructure demands</li> </ul> <p>Given the importance and potential significant effect on the plan, would it not have been better to have taken these issues into account prior to consultation?</p>	<p>Joint Local Plan, as appropriate.</p> <p>Initiatives such as the Northern Gateway Development Zone are not at a sufficiently advanced stage to be able to take into account at this stage. If evidence becomes available, and is considered to be relevant, the Joint Local Plan will need to consider the weight or any impact of such initiatives on the Joint Local Plan policies and proposals.</p>
IC062/451	Para 1.36 Next Steps	Marshall Fear	<p>The Core Spatial Strategy was written to address a number of Strategic Aims relating to housing but it is unclear how the Local Plan will address these issues which still remain.</p>	<p>The Strategic Options Document will set out the options for addressing the Issues and Challenges of the area, this will include, as one of the options, identification of the current Core Spatial Strategy and whether this strategy should continue.</p>
IC072/551	Para 1.36 Next Steps	Dean Lewis (Tim Dean)	<p>Section 19 of the 2004 Planning and Compulsory Purchase Act, requires that Local Plans are tested by way of a Sustainability Appraisal (SA), thereby meeting the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The SA should be carried out at each stage of the Plan's preparation. It is not clear that Stoke-on-Trent City Council and Newcastle-Under-Lyme has undertaken an SA on the Issues and Options. If this is not the case, then we would urge that one is undertaken as matter of expediency and the results made publicly available at the earliest opportunity.</p>	<p>The councils have prepared a Sustainability Appraisal Scoping Report, in line with the National Planning Policy Framework. Sustainability Appraisal will be undertaken at the Spatial Options Stage. This issues consultation only aims to identify the issues which the Joint Local Plan will need to address and does not, at this stage, present any options for addressing these, therefore a sustainability appraisal is not considered to be required for the Issues Consultation.</p>
IC072/552	Para 1.36 Next Steps	Dean Lewis (Tim Dean)	<p>The 'Vision' for Stoke-on-Trent City Council and Newcastle-Under-Lyme Borough Local Plan should be ambitious. It should recognise the needs of its' diverse community as the underpinning principle of its purpose. It should also recognise and face up to the challenges that have led to historic social deprivation, economic under performance and poor environmental conditions.</p>	<p>Noted. The Plans Vision, Aims and Objectives will be set out within the Strategic Options Document. Alongside the options for addressing the Issues and Challenges identified within the Issues Consultation Document.</p>
IC072/566	Para 1.36 Next Steps	Dean Lewis (Tim Dean)	<p>Dean Lewis Estates notes that I&amp;O does not directly deal with the fundamental matter deliverability of the plan.</p>	<p>Comments noted.</p>



			<p>In our view, a disproportionately high reliance on urban brownfield development will result in significant under delivery of the plan.</p> <p>Deliverability of previously developed sites should be thoroughly tested, not only in terms of viability, but in terms of compatibility of use. The longer gestation period for such sites to legitimately be in a position of deliverability should also be factored into the timescales for successful implementation of the plan.</p> <p>The Local Plan must acknowledge that PDL is not sufficiently available or deliverable to enable successful delivery of all of the needs of plan up to 2033.</p> <p>A portfolio of different types of sites, spread across Stoke-on-Trent and Newcastle-Under-Lyme will be necessary to provide the greatest chance of success of Council meeting its development needs sustainably.</p> <p>Funding procured from developments should be structured so as to aid cash flow of developers in order to significantly boost delivery rates. This approach provides a realistic and more robust strategy for successful and timely delivery of essential infrastructure. Requiring weighty upfront payments or payments too early on in the development of sites will impede growth. A policy in respect of infrastructure should enshrine this concept to ensure successful delivery.</p>	
IC081/618	Para 1.36 Next Steps	Celia Richie	<p>To date, building is planned in Newcastle to accommodate 955 students, some of which I am sure will have cars adding to the pollution. Stoke on Trent is to have more students from Stafford. Has the extra strain on medical/hosp services been taken into account?</p>	<p>The policies and proposals in the Joint Local Plan will be supported by an Infrastructure Delivery Plan which will consider the impact on local service provision.</p>

## Schedule of Comments - General

Reference	Consultee	Consultee Comments	Officer Comments
IC011/142	Thistleberry Residents Association	Unless robust data is forthcoming then quantitative statements made in the plan are subjective and speculative and any resultant remedies are unlikely to address any real issues/ challenges/ problems that might exist.	The Joint Local Plan is being developed based on the production of robust evidence. This evidence will be published alongside each stage of the plan production. The Issues Consultation document included evidence from an up to date Strategic Housing Market Assessment and Employment Land Review, among others.
IC011/146	Thistleberry Residents Association	Perhaps the main challenges are the sensitivity to note changes as they occur and make policy to deal with these changes in a timely way so that opportunities can be grasped. This needs sensitivity to change not opposition and party politicking, the skills and ability to understand the issues sufficiently to make the right adjustments to policy so that policy works on the ground and raises aspirations.	Noted
IC012/163	Keele University	In relation to the identification of the relevant planning issues for consideration, it is not disputed that those itemised in the consultation document are 'correct', but the issue of education, training and skills could warrant consideration as a specific item rather than being included as component parts of other identified issues.  - This issue has planning implications by, for example, the allocation of land to meet the requirements of education providers at all levels, and the need for training and skills provision to be addressed, where appropriate, in planning agreements and development initiatives.	Comments Noted. The issue of education, training and skills could be identified as a clearer, separate issue; however there are strong links with economic development, jobs and training. It is considered that this could be identified as a clearer sub-section of the economic development theme.
IC015/195	Richborough Estates	The Issues consultation documents fails to make reference to the presumption in favour of sustainable development as enshrined in Paragraph 14 of the Framework. On this basis, local planning authorities should positively seek opportunities to meet the development needs of their area. This presumption should be clearly set out as the guiding principle on which the Joint Local Plan	The next stage of the plan - Strategic Options, will set out details of the growth options for the area, in line with updated evidence and the National Planning Policy Framework. The Spatial Options Document will also set out the long terms vision, aims

		will be prepared.	and objectives for the plan ensuring that the plan is based on sustainable development principles.  The main Issues Consultation Document was written to be accessible for a variety of audiences and the document specifically avoided making too many direct references to paragraphs in the NPP. However paragraph 1.10 of the Issues Consultation Document clearly sets out that the councils responsibility to deliver sustainable development through the Joint Local Plan.
IC015/200	Richborough Estates	Richborough Estates welcomes the ongoing collaboration between Stoke-on-Trent and Newcastle-under-Lyme Council's in producing a Joint Local Plan, which reflects the Housing Market Area. Richborough Estates broadly support the approach and aims set out in the Issues Consultation document but contend that the emerging Plan should seek to be positively-prepared from the outset by adopting the higher OAN figure for the reasons presented. This approach will ensure the Joint Local Plan is positively prepared from the outset, justified, effective and consistent with the Framework, thereby meeting the tests of soundness which must be satisfied to ensure the timely adoption of the Joint Local Plan.	Support and views noted. It will be for the Joint Local Plan to determine the appropriate Objectively Assessed Need (OAN) figure. The strategic options consultation will set out details of the growth options for the area, in line with updated evidence.
IC015/201	Richborough Estates	Richborough Estates would wish to be involved throughout the preparation of the Joint Local Plan and reserve the right to supplement these initial representations with oral submissions when the Plan reaches the examination stage. In addition, Richborough Estates request an active involvement in any Housing Market Partnership or other steering group which may be convened to explore matters such as build rates, lead-in times etc which would be relevant to any future consideration of housing land supply matters.	Noted. The councils will continue to engage with stakeholders as the Joint Local Plan progresses, in line with the adopted Statement of Community Involvement and SHLAA methodology.
IC016/205	Strategic Land Group	The Issues consultation documents fails to make reference to the presumption in favour of sustainable development as enshrined in Paragraph 14 of the Framework. On this basis, local planning	The next stage of the plan - Strategic Options, will set out details of the growth options for the area, in line with updated evidence and the National Planning Policy

		<p>authorities should positively seek opportunities to meet the development needs of their area. This presumption should be clearly set out as the guiding principle on which the Joint Local Plan will be prepared.</p>	<p>Framework. The Spatial Options Document will also set out the long terms vision, aims and objectives for the plan ensuring that the plan is based on sustainable development principles.</p> <p>The main Issues Consultation Document was written to be accessible for a variety of audiences and the document specifically avoided making too many direct references to paragraphs in the NPP. However paragraph 1.10 of the Issues Consultation Document clearly sets out that the councils responsibility to deliver sustainable development through the Joint Local Plan.</p>
IC016/206	Strategic Land Group	<p>The Strategic Land Group welcomes the ongoing collaboration between Stoke-on-Trent and Newcastle-under-Lyme Council's in producing a Joint Local Plan, which reflects the Housing Market Area. The Strategic Land Group broadly support the approach and aims set out in the Issues Consultation document but contend that the emerging Plan should seek to be positively-prepared from the outset by adopting the higher OAN figure. As well as ensuring the Joint Local Plan is positively prepared, this approach will also ensure that the Joint Local Plan is justified, effective and consistent with the Framework, thereby meeting the tests of soundness which must be satisfied to ensure the timely adoption of the Joint Local Plan.</p> <p>The Strategic Land Group would wish to be involved throughout the preparation of the Joint Local Plan and reserve the right to supplement these initial representations with oral submissions when the Plan reaches the examination stage. In addition, the Strategic Land Group request an active involvement in any Housing Market Partnership or other steering group which may be convened to explore matters such as build rates, lead-in times etc which would be relevant to any future consideration of housing land supply matters.</p>	<p>Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses, in line with the adopted Statement of Community Involvement and SHLAA methodology.</p>
IC019/214	Realis	<p>It is noted that a key aim of the Joint Local Plan should be to strengthen the role of Stoke-on-Trent City Centre and provide a</p>	<p>Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan</p>

		<p>cohesive, positive strategy that seeks to attract inward investment that will contribute to its successful and continued regeneration. It is therefore important that the policies of the emerging plan continue to ensure that Hanley continues to operate and grow as the dominant sub-regional centre within the retail hierarchy, providing the main focus for retail, housing, employment and town centre uses. Realis has already made positive steps towards improving the vitality and viability of the City Centre. In August 2015 planning permission was secured for the redevelopment of Parliament Row / Old Hall Street. The approved scheme – which is an important step towards the transformation of the southern end of the City Centre for up to 58,000 sq ft of flexible, modern retail and leisure floorspace. Furthermore, Realis is continuing to work up plans for the redevelopment of the East West Centre and old bus station site. The scheme will transform the prominent city centre site into a premier shopping destination to comprise a wide range of shops, restaurants, vibrant public spaces and improved parking. It is with the above investment in mind that Realis wishes to make a number of practical observations in regard to the Joint Local Plan which, amongst other things, is intended to address the management and growth of Stoke-on-Trent City Centre and to ensure that it continues to fulfil a central role for both residents and visitors.</p> <p>Our observations are focused in response to the relevant policies in the Consultation document. They are designed to be productive, to ensure the vitality and viability of the City Centre is preserved and enhanced in line with National Guidance, and to assist the Local Planning Authority in advance of the Local Plan being progressed towards Examination.</p>	<p>progresses in line with the adopted Statement of Community Involvement. The Joint Local Plan will continue to consider the retail hierarchy and determine the most appropriate strategy for each of the centres.</p>
IC021/223	Intu Properties	<p>Intu is certain that Stoke-on-Trent City Council will fully support its development aspirations for the City Centre. The Joint Local Plan must provide a positive context for its future investment in the City Centre and also provide greater certainty that its planned investment will not be undermined by inappropriate development elsewhere including in less sequentially preferable locations.</p>	<p>Noted. The councils will continue to engage with all stakeholders as the Joint Local Plan progresses in line with the adopted Statement of Community Involvement. The Joint Local Plan will consider the most appropriate locations for investment and prepare a strategy to support balanced investment.</p>

IC039/349	Mr A P Thompson	20 year timescale is very long, too long. Events outside the councils control will determine most issues e.g economy, over population, infrastructure saturation, HS2. All of which are difficult to plan for.	Paragraph 157 of the NPPF requires local authorities to look at least a 15 year time horizon and take account of longer term requirements and be kept up to date.
IC048/376	Newcastle-under-Lyme Civic Society	The Civic Society broadly welcomes the intentions of the Joint Local Plan and its endeavour to provide a progressive framework for future growth within the District.	Support noted.
IC053/419	Elizabeth Forster	I object to there being a joint local plan	Both Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council made a decision at full council in March 2014 to prepare a Joint Local Plan.
IC062/445	Marshall Fear	The Local Plan Issues Consultation Document is well put together capturing the key messages and key challenges very well. However, an additional "box" is required which clearly identifies how the Plan will set out to address these individual challenges.	Support Noted. The Strategic Options consultation will set out the options available in addressing the issues and challenges identified within the Issues Consultation Document.
IC070/518	Janet Simpson (Madeley Parish Council)	The importance of partner agencies signing up to tackling the issues together cannot be stressed enough. Whilst appreciating this is primarily a Planning Document it is never possible to divorce service provision and communities from the whole picture.	Comments Noted. The Final Joint Local Plan will be supported by an Infrastructure Delivery Plan and this will take into account service provision.
IC081/615	Celia Richie	I consider your Joint Local Plan is just a talking shop among yourselves as I don't think the "real public" are aware of this document. Not everyone has computers and not everyone knows about this plan.	Comments Noted. In line with the adopted Statement of Community Involvement the councils will continue to inform, engage and actively encourage people to get involved in the production of the Joint Local Plan. A consultation statement will sit alongside the Joint Local Plan to evidence how we have involved local people.



## Schedule of Comments – Housing

Housing General			
Reference	Consultee	Consultee Comments	Officer Comments
IC014/192	HARP	<p>The Housing Standards Review which concluded in March 2015 has created a new approach for the setting of technical standards for new housing. The new streamlined system which took effect from 1 October 2015 comprises of national optional Building Regulations and an optional Nationally Described Space Standard. The application of the new optional technical standards in decision-taking and plan making was set out by the Government in the Written Ministerial Statement (WMS) of 25 March 2015. These new standards encompass optional Building Regulations on water and access, and a national standard on internal space on new dwellings, to act alongside existing Building Regulations through the planning system.</p> <p>As set out in the WMS, “local planning authorities should not set in their emerging Local Plans, neighbourhood plans or supplementary planning documents, any additional technical standards or requirements relating to the construction, internal layout or performance of new dwellings”.</p> <p>Paragraph 002 (Reference ID: 56-002-20150327) under Housing – Optional Technical Standards of the Planning Practice Guidance (PPG), states that if a Council wishes to introduce the optional technical standards “local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans”.</p> <p>With this in mind, the reference in the Issues consultation document to such standards as Code for Sustainable Homes and Lifetime Homes is incorrect as these standards have been replaced. Reference should instead now be given to the optional Building Regulations Part M4 (2) and (3) in relation to accessibility and no reference to energy as this is now superseded by the already mandatory requirement to meet Part L of the Building Regulations. Importantly, however, the Council cannot make reference to a requirement for the optional standards until they have provided evidence for a clear need for them and evidence to show that they have been robustly tested in terms of viability.</p> <p>All references to housing standards should therefore be removed at this point.</p>	<p>Comments noted. Future references to the Code for Sustainable Homes in Joint Local Plan documents will make it clear that this has now been revoked by the Government. The Lifetime Homes standard is not administered by the government and so it hasn't been revoked, however the councils recognise that any optional technical standards for new housing need to be supported with evidence that provides justification for such standards to be applied.</p>
IC029/281	Barratt	We welcome and endorse the statement in the Issues Consultation Document	Supporting comment noted.

	Homes	(paragraph 2.7) that a primary aim of the Joint Local Plan must be to locate new homes in sustainable locations to meet the identified needs and aspirations of the area.	
IC046/370	Cheshire East Council	That the SHMA identifies Newcastle-under-Lyme and Stoke-on-Trent as a single housing market area, whilst acknowledging that there are wider relationships with other authorities including Cheshire East, and the conclusion that these relationships are not considered strong enough to include these authorities as part of the single housing market area.	Comment noted.

Issue 1: Housing Need			
Reference	Consultee	Consultee Comments	Officer Comments
IC002/2	St Modwen	<p>The Strategic Housing Market Assessment (SHMA) 2015 has identified that there is a need to build 27% more homes than the Core Strategy has planned for, paragraph 3.15 of the Consultation Paper notes. St Modwen are undertaking their own review of Objectively Assessed Housing Needs as part of their promotion of land interests, including Berry Hill, within the JLP area. It is our view that therefore, this is the minimum uplift that will be necessary, (i.e. providing for an OAN range of 1,177 to 1,504 additional dwellings per annum across the two LPAs). We note that only 643 net additional dwellings were delivered between the two LPAs per annum, on average, for the period 2006/07 to 2014/15. The step change that is required to meet the minimum OAN identified by the Council (which St Modwen consider will need to increase as the work on the JLP progresses) is significant. We note that paragraph 4.8 of the Housing Technical Paper refers to an aim of this consultation, as being to narrow down the range of the OAN towards identifying a 'watertight housing requirement'.</p> <p>We have some reservations about the focus on the housing requirement being 'watertight' given there is a need for headroom within the JLP, and the Technical Paper itself recognises that constraints imposed by the supply of land, viability and infrastructure needs will need to be taken account of. The housing requirement should be set high enough to allow for these constraints. Secondly, to ensure that there is certainty in the ability of the two Councils to deliver the</p>	<p>Comments regarding support for the minimum uplift are noted.</p> <p>The councils have considered the evidence provided by St. Modwen's review of Objectively Assessed Housing Needs as part of the latest review of the Strategic Housing Market Assessment, which will inform Strategic Options.</p> <p>In regard to the reference to the housing requirement being 'watertight', this is intended to reflect that the housing requirement has to be robust and able to stand up to scrutiny and challenge at the examination of the Joint Local Plan. Paragraph 47 of the NPPF requires local planning authorities to apply an additional buffer of 5% to their five year housing requirements (moved forward from later in the plan period) or where there has been a record of persistent under delivery of</p>



	<p>JLP housing requirement, the identification of deliverable sites, of a form and scale commensurate with these challenging targets will be necessary.</p> <p>The St Modwen controlled land (at Berry Hill) fulfils the criteria that one might apply (taking account of paragraphs 47 and 50 of the Framework) when seeking to allocate sites, and provides the certainty that is necessary to meet increased housing requirements. Paragraph 3.24 of the Consultation Paper references the market factors and deliverability of sites that were factors in the limited number of past completions. These are two areas that St Modwen can advise on and address if land at Berry Hill is allocated within the JLP. This is because St Modwen have a track record of delivery within the JLP area, as can be seen by St Modwen Homes progressing the development of a site for 300 homes at Trentham Manor, and their commercial interests have seen continued investment and development across the conurbation. St Modwen know the local market, and have a number of sites in addition to Berry Hill that are being promoted through this JLP process.</p> <p>Allocating a strategic site like Berry Hill, which is controlled by a national developer (St Modwen) could also instil confidence within the local housing market area, and address the impacts of previous targeted regeneration within the urban areas, that are referenced in paragraph 4.9 of the Housing Technical Paper as having played a role in constraining housing delivery historically.</p> <p>Addressing housing need requires a deliverable supply of housing. Having a five year housing land supply is an inherent part of preparing a Local Plan and presenting it positively for Examination in due course. We note that paragraph 3.7 of the Housing Technical Paper (2016) refers to the fact that Stoke on Trent City Council have not produced a formal five year housing land supply statement to date and that a recent appeal decision (App/M3455/A/13/2199404) confirmed that there was not a deliverable 5 year supply of housing land. St Modwen's view is that having key strategic sites identified in the JLP (as opposed to opting for Site Allocations DPDs and the delays associated with that planning strategy) will provide confidence to developers and housebuilders, and enable the early delivery of such sites in tandem with the JLP being prepared. In turn this will provide opportunities for agreed phasing of delivery that can assist in ensuring the Council is in a favourable five year housing land supply position going forwards. St Modwen have an excellent track record of delivering strategic sites like land at Berry Hill, by creating 'oven ready' sites for residential development by undertaking reclamation, infrastructure etc. and through their own residential</p>	<p>housing, local planning authorities should increase the buffer to 20%. This is intended to 'ensure choice and competition in the market for land' and should provide the flexibility to address concerns regarding 'headroom'.</p> <p>Constraints on the supply of land for housing development will be identified and assessed within each authority's Strategic Housing Land Availability Assessment. The impact that these constraints will have on the delivery of new housing development will be considered at the Strategic Options stage.</p>
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IC005/20	St Modwen	<p>The consultation document is based upon the evidence of the Strategic Housing Market Assessment (SHMA) undertaken by Turley. The SHMA assessed the Full Objectively Assessed Need (FOAN) as ranging between 1,177-1,504 dwellings per annum. An RPS technical note critiquing the SHMA has been attached at Appendix 2. This note considered the process of identifying the FOAN range based on the demographic assumptions, the local market signals and the economic growth assessed within the SHMA. The note concludes that a number of factors have been identified which indicate that the 2015 SHMA needs to be amended in order to correctly reflect the key variables involved in the calculation of the FOAN for Stoke and Newcastle. In particular, there are some deficiencies associated with the demographic component of need and the correct application of economic forecasts within the assessment. For these reasons, it is considered that the annual figure of 1,504 presented by the Councils in the Joint Local Plan is likely to represent the minimum figure of housing need.</p> <p>Evidence suggested in the technical note suggests that whilst this is the minimum figure to work towards, there are justifications for further increases, which may increase further once the latest population forecasts are released later this year.</p> <p>Paragraph 2.13 of the Issues consultation document states that “The lower end</p>	<p>Comments noted. The technical note produced by RPS has been considered further through the updated SHMA.</p> <p>In regard to the appropriate OAN, this has been investigated through the SHMA review and will be discussed at the Strategic Options, Draft Plan and Final Draft Plan consultation stages for the Joint Local Plan.</p>

		<p>of the OAN does not consider the economic trends across the plan area and therefore does not reflect the likely job growth required to support job creation.” As set out within the technical note, even the upper figure is likely to need revising, therefore looking to agree a housing target in excess of the minimum SHMA range is encouraged.</p> <p>The Issues consultation paper raises concern that whilst the greater of the two targets is likely to result in greater economic activity and regeneration for the joint authority areas, it also raises the question of whether there is sufficient land within the areas to accommodate the required housing numbers.</p>	
IC005/21	St Modwen	<p>The conurbation of Stoke and Newcastle is encircled by Green Belt which presents a significant barrier to growth immediately adjacent to the existing urban area. Although at this stage, options for dealing with the housing requirement have not been presented, it is recommended that, in accordance with the principle of the National Planning Policy Framework (NPPF), policies encouraging the re-use of brownfield land are included, and sufficiently flexible to allow redevelopment for alternative uses. St Modwen control a number of, now vacant, commercial sites in areas appropriate for residential redevelopment. It is essential that future policy options are sufficiently flexible to allow for the redevelopment of these sites without significant barriers to create attractive and viable residential sites.</p> <p>No strategic site availability assessments or capacity assessments appear to have been undertaken so far therefore it is unclear how the LPAs can examine whether there will be sufficient land to accommodate the housing requirements or not. Paragraph 2.17 of the Consultation Document picks up on this stating “if we can’t demonstrate a sufficient supply of housing land without change to the current development plan strategy then we would have to consider alternative policy options...” It is imperative that the joint authorities consider these options for dealing with a shortfall in available land; it is recommended that this is through means such as increasing flexibility for redeveloping brownfield sites and the appropriate release of Green Belt land or increasing capacity/density on sites.</p> <p>The Joint Local Plan should include Strategic Sites for housing rather than relying on subsequent Site Allocations DPDs so as to avoid delays, provide confidence for large allocations and enable early delivery of key sites. This is set out in further detail with respect to the Berry Hill land by Barton Willmore.</p>	The need for adjustments to policy, the identification of potential strategic sites, the use of brownfield land, and duty to cooperate discussions with adjoining authorities will all be considered at the Strategic Options stage.

		<p>The duty for neighbouring authorities to co-operate also needs to be fully explored, particularly if it is unlikely that the full residential requirement cannot be accommodated on appropriate sites within the joint authority area.</p> <p>Demonstrations of neighbouring authorities' willingness to co-operate should be secured at the earliest possible stage to ensure that the full objectively assessed housing need can be met. This is particularly key in relation to Staffordshire Moorlands from which, according to the 2011 census data, 9.5% of those in employment travel into Stoke. This is a considerable proportion which demonstrates a strong commuting link between the two authority areas.</p>	
IC009/56	Councillor Derek R Davies - NDP Steering Group	<p>The unevidenced basis and the overestimation of housing need is very concerning. Newcastle under Lyme will never have a 5-year land supply. Is this the intention? If that is the intention it will never have plan-led development.</p> <p>The affordable housing numbers in Part 2 of the SHMA are incomprehensible but how reliable can they be given the scale of the errors found in the other housing documents.</p> <p>There is bias in the way in which evidence is presented in the SHMA in relation to the rural / urban area which does not give an accurate representation, including data about housing prices.</p> <p>The rural area should not be used as a dormitory for people working in the urban area.</p> <p>The emerging Neighbourhood Development Plans will produce detailed housing needs assessments which will be more relevant to the rural area and these will need to be incorporated in the Joint Local Plan.</p>	<p>Local Planning Authorities are required by paragraph 47 of the NPPF to demonstrate that there are sufficient deliverable sites to provide five years worth of housing against their requirements. It will therefore be a key test of the Joint Local Plan at examination that both authorities will be able to demonstrate a five year housing land supply.</p> <p>The affordable housing need figures in the SHMA have been calculated under a different methodology to all other data contained within the SHMA, the Joint Local Plan Issues Consultation Document and the Housing Technical Paper. This is a widely accepted approach and is consistent with the methodology laid out in the national Planning Practice Guidance.</p> <p>The SHMA has been undertaken in an objective manner by consultants who are external to both councils. The approach taken to collect and analyse data to inform the study is to sub-divide both authorities in to a number of sub areas. In Newcastle there are four sub areas covering the rural</p>

			<p>area compared with two for Newcastle urban area and one for Kidsgrove and its surroundings. There is therefore a wide range of evidence which is presented for the rural area within the SHMA and this is especially evident in Figure 5.3 which presents a detailed breakdown of house prices across both authorities and also by the sub areas within them.</p> <p>Potential future growth options for development in the rural area will be explored at the Strategic Options stage.</p> <p>We welcome the production of housing needs assessments to inform the preparation of the borough's Neighbourhood Development Plans. These assessments will be needed to be based on the evidence presented in the SHMA and they will need to be subject to review before they can be considered as adequate evidence to inform the Joint Local Plan.</p>
IC009/57	Councillor Derek R Davies - NDP Steering Group	<p>Lack of rural focus and Rural Proofing</p> <p>The rural area is 55.6% of the joint plan area yet there is virtually no mention of it in the plan document. The needs and role of the rural area are dramatically different from the polycentric urban area and the plan policies need to address these needs.</p> <p>The rural area should not be used as a dormitory for the urban part of the plan area. The needs in the rural area are for the development of a thriving and sustainable rural economy.</p> <p>Much of the infrastructure of the rural area is dependent on the county council because Newcastle under Lyme is a second tier authority. There is no reference to this and the need for a close working relationship with Staffordshire County</p>	<p>The rural area and the issues that affect it are frequently referenced throughout the consultation document.</p> <p>Potential planning policies relating to development in the rural area will be explored at Strategic Options.</p> <p>Development in the rural area will need to be considered in a different way to development in the urban area. Also close working with Staffordshire County Council will be required to understand the infrastructure requirements</p>

		Council.	of the rural area.
IC009/58	Councillor Derek R Davies - NDP Steering Group	<p>The SHMA has identified a need for between 1,177-1504 dwellings per annum across Stoke on Trent and Newcastle under Lyme. These figures do not seem to reflect any of the current or projected statistics that have been provided in the housing requirement forecasts of the Core Spatial Strategy (CSS) 2009 (855 dwellings per annum 2006-2026) or the 2012 Sub-National Housing Projection (SNHP) (published Feb 2015, stating 691 dwellings per annum). Talking into account the population estimates that have been provided by the ONS <a href="http://webarchive.nationalarchives.gov.uk/20160105160709/http://ons.gov.uk/ons/dcp171766_34_5019.pdf">http://webarchive.nationalarchives.gov.uk/20160105160709/http://ons.gov.uk/ons/dcp171766_34_5019.pdf</a> On sheet 5 of the attached Excel file of ONS data on sub-regional population estimates and projections, 2001-2021, the highlighted row for NuL predicts a population increase for the period 2011-2021 of 5.2%; of that, a significant proportion will be aged over 65. The figures projected from the SHMA for the required number of dwellings appear highly unrealistic and there no transparent evidence is provided in the Joint Local Plan paper, Housing Technical Paper, SHMA or other evidence to support such a dramatic increase in housing as compared to previous projected figures.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The main driver of the 58% increase in housing requirements over the previous CSS and SNHP needs to be evidenced, given that (1) the predicted population increase for the area is only 5.2% and (2) there are no transparent reports of the dramatic economic or employment market change.</li> <li><input type="checkbox"/> There is no link to evidence from Experian, Cambridge Econometrics or Oxford Economics on economic or employment forecasts that provides transparent evidence to conclude that a 58% increase in housing is required in the borough.</li> </ul>	<p>The Core Spatial Strategy housing requirement figure of 855 new dwellings per annum is derived from the revoked West Midlands Regional Spatial Strategy and as such, according to the national Planning Practice Guidance (PPG), 'may not adequately reflect current needs'.</p> <p>The figures presented in Excel spreadsheet provided to support this comment are derived from the 2011-based interim Sub-National Population Projections. These have been superseded by the 2012 Sub-National Population Projections. It is the 2012 projections which form the basis for all of the modelling undertaken in the SHMA and which lead to the 1,177-1,504 new dwellings per annum range. The findings of the SHMA are discussed in both the Issues Consultation Document and the supporting technical paper.</p> <p>A guide to the Experian model is provided as an appendix to the Employment Land Review. More detailed guidance on the economic models can be obtained directly from the forecasting companies themselves.</p>
IC009/60	Councillor Derek R Davies - NDP Steering Group	<p>Data presented in the SHMA points to a low demand for housing in the HMA.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Level of owner-occupation high in comparison to West Midlands and England.</li> <li><input type="checkbox"/> Level of under-occupation of dwellings very high in comparison to West Midlands and England.</li> <li><input type="checkbox"/> House prices low in comparison to West Midlands and England.</li> <li><input type="checkbox"/> Rents low in comparison to West Midlands and England.</li> </ul>	<p>The first point is not an indicator of low demand (it could just as much indicate high demand)</p> <p>Low demand may be a particular issue for the Joint Local Plan to address although</p>

			this isn't explicitly drawn out in the Issues Consultation Document.
IC009/113	Councillor Derek R Davies - NDP Steering Group	<p>It is essential for NuL to develop Local Plan policies that (1) specifically protect the rural area from inappropriate development and (2) focus on the natural environment, biodiversity and supporting a healthy rural economy. Housing and employment development in the rural area should focus on sustaining the rural population and economy, not on expansion.</p> <p>It is also essential for NuL to have a Local Plan that enables it consistently to demonstrate a five-year supply of housing land. NuL should not plan for more housing development than its recent planning history demonstrates that it can realistically deliver. Without this, development will continue to be developer led, not plan led; the Joint Local Plan will be unenforceable; and NuL will find it difficult to protect its rural area.</p>	<p>Future policies for rural development, the natural environment and the rural economy will be explored at the Strategic Options stage.</p> <p>It is essential for the Joint Local Plan to demonstrate a five year supply of housing land. This will be tested at examination.</p>
IC010/133	Whitmore Parish Council	<p>Whitmore has very serious concerns regarding the proposed new dwelling build targets reported in the consultation document. This states that for the combines joint NULBC + Stoke:</p> <ul style="list-style-type: none"> <li>- the target new build level set in the Core Spatial Strategy was 855 a year</li> <li>- the average new build achieved over the past 8 years = 643 a year</li> <li>- the target new build set in the SHMA for the period 2013-2033: <ul style="list-style-type: none"> <li>- 1,172 yr minimum level to meet projected population growth needs</li> <li>- 1,504 yr to meet enhanced growth expectations.</li> </ul> </li> </ul> <p>These targets (1,172/1,504) represent in round figures, Two/Two and a half times what has been able to be achieved over the past 8 years (643). As such they represent not simply a significant improvement in performance but a quite extraordinary escalation of build rate. Basic management practice is indeed to set targets/objectives BUT they have to be seen to be realistic (achievable). We believe that for these targets to be seen to be achievable NULBC + STOKE combo must already have an overarching strategy in mind.</p> <p>We are aware that the validity of some of the data used in producing these targets has been challenged. Whitmore PC therefore wishes to urge the</p>	<p>We note Whitmore Parish Council's acknowledgement of the large escalation in the identified housing needs when compared with the previous plan target. The Issues Consultation Document reflects this large escalation within the key challenges identified under Issue 1.</p> <p>The strategy to address the higher rate of housing growth is to be formulated as work on the Joint Local Plan progresses. This is one of the main purposes of the Joint Local Plan.</p> <p>In regard to the data that has informed the evidence and information presented in the Issues Consultation Document, this will be kept under continual review by both councils and will be updated.</p>

		Borough Council to revisit their calculations in order to validate/correct these calculated target levels BEFORE they get adopted as official policy.	
IC011/136	Thistleberry Residents Association	It is difficult to work out from this section if the total population is rising or falling and if the latter, what implications this has for housing need. Figures in addition to percentages should be given. Also it is unclear how students are to be retained or how LAs are to encourage an increase in population. Are the housing projections linked in with the fall of population and is the housing type linked in with the socio-economic profile of people the LAs want to attract and retain?	The population of both areas is predicted to rise. This is the main driver of the projected housing growth presented under Issue 1. Detailed data and figures behind this are presented in the Housing Technical Paper and this is referenced at the start of the housing section. The SHMA contains the full evidence including the profile of future population and households.
IC011	Thistleberry Residents Association	There seemed to be insufficient evidence with regard to statistics to justify an emphasis on the need for 15000 extra homes in Newcastle.	It is not clear where the 15,000 extra homes figure referred to in this comment has been obtained from. The housing need scenarios for Newcastle that inform the OAN identify a range from 9,542 to 17,654 new homes in Newcastle between 2013 and 2039. No scenario leads to the 15,000 figure. This also needs to be considered in the context of the NPPF requirement to meet housing needs across the housing market area, which encompasses both Newcastle-under-Lyme and Stoke-on-Trent.
IC012/164	Keele University	In terms of approach, it is right to identify both need and aspiration as the basis for addressing the issue of future housing provision (Para 2.7)	Supporting comment noted
IC012/166	Keele University	It is considered that the higher level projections (1504 units) should be adopted as the target figure in order to ensure that the economy grows to its full potential including opportunities for young people to purchase a home. (Para 2.14)	Preference for the highest level of the OAN range is noted. Whether or not this is an appropriate level to apply will be explored further at Strategic Options.
IC013/181	Staffordshire Chambers of Commerce	It is right to identify both the area's need and aspiration as the basis for addressing the issue of future housing provision. Evidence provided in the HS2 Stoke Route consultation response, and the Northern Gateway Development Zone identifies significantly more future housing and economic growth	Supporting comment noted  The growth implications of HS2 and the Northern Gateway Development Zone will



		opportunities arising from HS2 and it is important that the area plans for and benefits from this growth.	be considered further as work on the Joint Local Plan progresses.
IC015/193	Richborough Estates	Whilst Richborough Estates consider that the Joint Local Plan Issues document broadly identifies the relevant planning issues, they are concerned that no Green Belt review has been undertaken at the outset. This is a fundamental evidence base document and of particular relevance given the acknowledged failure of the previous strategy of targeted regeneration which has demonstrably failed to deliver sufficient housing in the previous plan period	Broad support for the planning issues identified is noted.  In regard to a potential Green Belt review, it is not possible to progress with such work until a need for it has been identified. The Strategic Options consultation will explore the ability of both areas to accommodate the identified levels of growth. This will include an assessment of whether there is sufficient deliverable and developable housing land available to accommodate development with or without adjustments to current planning policies. This will include a consideration of existing Green Belt boundaries.
IC015/194	Richborough Estates	In addition, it should take a more positive approach in terms of the housing and economic strategy. For reasons outlined in the enclosed technical response to the Strategic Housing Market Assessment (SHMA) prepared by Barton Willmore, Richborough Estates consider that the OAN figure should be higher than that identified in the SHMA. Specifically, the range proposed for the joint area should be 1,630 - 2,240 dwellings per annum (dpa) for the plan period 2013-2033. This equates to a range of 650 – 830 dpa in Newcastle Borough and 980 – 1,410 dpa in Stoke-on-Trent. Furthermore, such targets should be expressed as minima in accordance with the objectives of the Framework to boost significantly the supply of housing. The higher housing target is more likely to deliver the transformational changes which are central to the aims of the Joint Local Plan i.e. retaining higher levels of residents than in previous years. In a historic sense, the combination of a comparatively low Regional Strategy housing target and the strategy of targeted regeneration within the Inner Urban Core have conspired to suppress historic housing delivery in Stoke-on-Trent and Newcastle and erode confidence in the housing market. These past failures would have informed the full, objectively assessed need ('FOAN') for both market and affordable housing now identified under the Strategic Housing Market Assessment (SHMA). Therefore, any	The information provided in the accompanying technical paper is insufficient to enable the councils to determine whether or not the assumptions contained within it are appropriate to apply. Specific examples include; 1. Whether the vacancy rate derived from the CLG live tables is based on a single year or an average of multiple years and whether or not it includes short term vacant dwellings 2. What the advice of ONS was that led to the conclusion that UPC should be excluded. 3. The explanation provided as to why female households have been excluded from the household formation rates is insufficient. This appears to omit a significant aspect of the new household

		<p>housing requirement which is anything less than the higher OAN range identified in the SHMA risks compounding past structural problems in the housing market which have failed to deliver sufficient quantities of both market and affordable housing.</p> <p>Whilst it may not be currently possible for either Council to confirm whether it is able to meet the higher OAN figure, it should underpin the emerging Joint Local Plan from the outset in order for the Plan to be positively prepared; a key test of soundness referred to in Paragraph 182 of the Framework. Additionally, it is critical that the Joint Local Plan does not follow the previous strategy of targeted regeneration or express any preference or priority for previously developed land; the Framework is explicit that brownfield land should be used effectively, however the Joint Local Plan must ensure that there is greater emphasis on development in sustainable locations which can include rural areas and greenfield sites (both within and outside of the Green Belt). This approach would also redress historic matters of viability or past failures to deliver the social benefits such as affordable housing, and help redress the identified gap between housing permissions and housing completions. It also recognises the potential ecological value of previously developed sites which have naturally revegetated which is a key issue identified in the Joint Local Plan.</p> <p>It is also argued that larger sites released in viable greenfield locations also have the potential to help regenerate brownfield sites located within the urban areas by way of, for example, commuted sum payments for off-site affordable delivery. Such as strategy would not only help both Authorities ensure it could demonstrate a robust five year supply of deliverable housing sites (as required under Paragraph 47 of the Framework) but would also help to unlock and regenerate the more commercially challenging brownfield sites located in the Urban Core and act as a stimulus within the local housing market.</p>	<p>formation rate.</p> <p>The accompanying information has been used to inform the SHMA update and will feed into Strategic Options.</p> <p>There is no evidence provided to support the assertion that the previous regional strategy target has suppressed housing delivery. The Barton Willmore technical paper highlights the SHMA finding that the Housing Market Renewal Programme did have a suppressing effect but it doesn't suggest any such effects were due to past regional targets.</p> <p>There is also no evidence provided to suggest that higher end of the OAN range should be regarded as minima. Paragraph 2.31 of the Barton Willmore technical paper highlights the SHMA finding that the demographic led scenarios would exceed past trend job growth in both authorities. The PPG requires an assessment of the likely change in job number based on past trends and/or economic forecasts as appropriate, with particular regard to the growth of the working age population.</p> <p>In regard to the future development strategy for the area, the Strategic Options consultation stage will begin to explore this.</p>
IC016/202	Strategic Land Group	<p>Whilst the Strategic Land Group broadly support the planning issues identified, the Joint Local Plan Strategy should take a more positive approach in terms of the housing and economic strategy. The Joint Local Plan should adopt the higher objectively assessed need (OAN) figure of 1,504 dwellings per annum (dpa) for the Plan period, across both authorities. Furthermore, such targets</p>	<p>Support for the higher end of the OAN range noted, however there is currently no evidence to suggest that higher end of the OAN range should be regarded as minima.</p>

		<p>should be expressed as minima in accordance with the objectives of the Framework to boost significantly the supply of housing.</p> <p>The higher housing target is more likely to deliver the transformational changes which are central to the aims of the Joint Local Plan i.e. retaining higher levels of residents than in previous years. In a historic sense, the combination of a comparatively low Regional Strategy housing target and the strategy of targeted regeneration within the Inner Urban Core have conspired to suppress historic housing delivery in Stoke-on-Trent and Newcastle and erode confidence in the housing market. These past failures would have informed the full, objectively assessed need ('FOAN') for both market and affordable housing now identified under the Strategic Housing Market Assessment (SHMA). Therefore, any housing requirement which is anything less than the higher OAN range identified in the SHMA risks compounding past structural problems in the housing market which have failed to deliver sufficient quantities of both market and affordable housing.</p> <p>Whilst it may not be currently possible for either Council to confirm whether it is able to meet the higher OAN figure, it should underpin the emerging Joint Local Plan from the outset in order for the Plan to be positively prepared; a key test of soundness referred to in Paragraph 182 of the Framework. Additionally, it is critical that the Joint Local Plan does not follow the previous strategy of targeted regeneration or express any preference or priority for previously developed land; the Framework is explicit that brownfield land should be used effectively but does not promote a sequential approach prioritising brownfield land over greenfield. Therefore, the Joint Local Plan must ensure that there is greater emphasis on development in sustainable locations which can include greenfield sites in accessible locations. This approach would also redress historic matters of viability and past failures to deliver the social benefits such as affordable housing, and help redress the identified gap between housing permissions and housing completions.</p>	<p>There is also no evidence to support the assertion that the previous regional strategy target has suppressed housing delivery. The SHMA found that the Housing Market Renewal Programme did have a suppressing effect but it doesn't suggest any such effects were due to past regional targets.</p> <p>In regard to the future development strategy for the area, the Strategic Options consultation stage will begin to explore this.</p>
IC017/207	Pochin Property	<p>Paragraph 47 of the National Planning Policy Framework ('the Framework') requires Local Plans to meet the full, objectively assessed housing needs of their area. The Joint Newcastle-under-Lyme and Stoke-on-Trent Strategic Housing Market Assessment (SHMA) identifies an objectively assessed need (OAN) ranging from 1,777 to 1,504 dwellings per annum across both authorities between 2013 and 2039.</p> <p>It is vital that the Joint Local Plan seeks to support the higher level of growth being identified through the evidence in order for the area to realise its full economic potential. The two authorities are uniquely placed as a 'gateway'</p>	<p>General supporting comments and support for the higher rate of growth are noted.</p> <p>The growth implications of HS2 and the Northern Gateway Development Zone will be considered further as work on the Joint Local Plan progresses.</p>

		<p>between Manchester and Birmingham to connect and support the economic growth in the two City Regions, providing new housing and jobs and realising the opportunities generated by HS2. As you will be aware, this potential has been recognised through the recent launch of the Northern Gateway Development Zone, a collaboration between local authorities, including Newcastle-under-Lyme and Stoke-on-Trent, which aims to unlock major new growth and investment opportunities.</p> <p>Providing enough homes in the right location and of the right type will be critical to attract and retain people in the Newcastle/Stoke Area, helping to rebalance the ageing population in Newcastle-under-Lyme, retain skilled workers and improve the economic competitiveness of the area.</p> <p>We welcome the explicit recognition in the Issues Consultation document that even if the lowest OAN figure were used as a basis for the new Local Plan, this would result in a level of growth significantly higher than the adopted Joint Core Strategy (2009) planned for and that therefore a fundamental review of the Spatial Strategy and distribution proposed through the previous Core Strategy is now required. We agree with this view.</p>	
IC020/220	Wardell Armstrong	<p>The assessment of the future economic growth and performance of 'Stoke and Newcastle' is a key driver of the Plan strategy, not only for the economic strategy, but also for the housing strategy. The Plan evidence base seems to point to a growth rate range of which points to the need for 190 to 334 hectares of new employment land and between 1,177 and 1,504 new homes. However, the forecasted growth seems to stem from a single source of employment forecasts (Cambridge Econometrics) utilising a 'policy on' scenario. The Experian predictions seem to be better aligned to ambitious economic growth and would appear to suggest the 334 is indeed a minimum requirement.</p>	<p>The employment land growth figures within the range quoted within this representation originate from a range of scenarios in the SHMA and the Employment Land Review, and they encompass demographic led housing need scenarios, not just the one 'policy on' Cambridge LEFM scenario.</p> <p>Support for the Experian forecast is noted; however the preference towards the Cambridge LEFM forecast is fully explained and justified within both the SHMA and the ELR.</p>
IC023/240	Ian Jeffries	<p>With regard to housing, our client notes the recent publication of the Strategic Housing Market Assessment (SHMA), and the need for a significant uplift in housing delivery to meet demographic change as well as meeting aspirations to deliver significant economic growth. It is considered in line with national policy, that the upper end of the OAN is used as the starting point for determining the housing requirement figure across the two authorities in order to boost significantly the supply of housing, and to allow the two authorities to better meet</p>	<p>Support for the higher end of the OAN range is noted.</p>

		aspirations for economic growth. Using the higher end of the OAN as the starting point would also be more compliant with the National Planning Policy Framework.	
IC023/241	Ian Jeffries	<p>An increase in the local housing requirement figure will require the two authorities to deliver housing on the edge of existing settlements, as well as seek to deliver housing through the redevelopment of previously developed land within the urban area, or other previously developed land in rural areas where appropriate. In the case of releasing land for development around existing settlements, it is considered that smaller settlements, such as Keele have a vital role to play in helping the Borough to meet its objectively assessed housing needs in the form of both infill developments and small extensions to the settlement. It is therefore considered that when the two authorities move forward with the next stages of Local Plan preparation that it undertakes a full Green Belt review, as well as consider extending existing infill boundary lines, village development boundaries, and consider “insetting” or defining infill boundary lines around other pockets of rural residential areas. Infill plots, and other smaller sites of less than 25 dwellings have historically provided a reliable supply of housing sites across the Borough, and are quicker and easier to develop, and therefore, and could make a valuable contribution to early housing delivery across the Borough in the plan period if all village boundaries and infill boundaries were properly reviewed. Our clients own such suitable sites around the settlement of Keele that are considered to be suitable for residential development. These sites adjoin existing residential development, and it is considered that such sites could be quickly developed if the built up area boundary / infill boundary lines were redefined as part of the new Joint Local Plan process</p>	<p>The Strategic Options stage will explore potential development strategies to be taken forward through the Joint Local Plan. This will include the broad locations for sustainable development. Further exploration of detailed policy responses such as infill development and the extent of settlement boundaries are likely to follow at the draft plan stage.</p> <p>It will not be possible to undertake a Green Belt review unless a need for one has been identified. This will be identified through an exploration at Strategic Options of the capacity of sites to accommodate development in the area without policy adjustment.</p>
IC024/242	Mr J Poole	<p>In line with aspirations to grow the economy, and make North Staffordshire a “net contributor” to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are suitably located in close proximity to shops, services, public transport and the strategic road network. The above is likely to necessitate a review of Green Belt boundaries, and this matter is addressed later in this representation.</p> <p>Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising</p>	<p>Support for the higher end of the OAN range is noted.</p> <p>The Strategic Options stage will consider the appropriate development strategy to be applied within the Joint Local Plan. This will include the broad locations for sustainable development and an exploration of the relationship between greenfield and brownfield development.</p> <p>It will not be possible to undertake a Green</p>

		<p>from the latest SHMA further, and exploring other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth.</p>	<p>Belt review unless a need for one has been identified. This will be identified through an exploration at Strategic Options of the capacity of sites to accommodate development in the area without policy adjustment.</p> <p>Both councils support the need for further engagement with the development industry and will ensure that this happens as part of the work to further refine the OAN range towards the identification of a new housing requirement.</p> <p>Both councils will also give further consideration to the need for specific housing types such as executive housing, starter homes and student housing.</p>
IC024/250	Mr J Poole	<p>In Green Belt terms, should the Council carry out a Green Belt review, then it is considered that land around Lightwood would be suitable for release to meet objectively assessed housing needs.</p>	<p>Comments noted.</p> <p>It will not be possible to undertake a Green Belt review unless a need for one has been identified. This will be identified through an exploration at Strategic Options of the capacity of sites to accommodate development in the area without policy adjustment.</p> <p>Both councils are currently undertaking a review of the Green Belt in order to understand how well it is performing against its five purposes, as set out in the NPPF.</p>
IC025/251	Barratt Developments PLC	<p>Prior to the publication of the National Planning Policy Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is</p>	<p>Support for the higher end of the OAN range is noted.</p> <p>The SHMA recognises that the Housing Market Renewal Programme did act as a</p>

		<p>acknowledged at paragraph 2.21 of the Issues and Options Consultation paper. It is the opinion of Knights therefore that the higher level of housing need is more appropriate to address a previously suppressed housing market.</p> <p>A higher housing requirement is likely to necessitate a review of Green Belt boundaries and other settlement boundaries adjacent to countryside that is not designated as Green Belt, and this matter is addressed later in this representation.</p>	<p>constraint to housing delivery in the past. However this has been taken in to account as part of the identification of the OAN range. It does not provide justification for applying only the higher end of the range.</p> <p>With regards to a review of Green Belt boundaries it will not be possible to undertake this unless a need for one has been identified. This will be identified through an exploration at Strategic Options of the capacity of sites to accommodate development in the area without policy adjustment.</p>
IC025/252	Barratt Developments PLC	<p>Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising from the latest SHMA further, and exploring other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth. Meeting the needs for other types of housing other than open market housing may increase the objectively assessed housing need figure further. A further review of the SHMA, along with further workshops are therefore considered to be essential to avoid any unnecessary delay in having an adopted plan in place.</p>	<p>Both councils support the need for further engagement with the development industry and will ensure that this happens as part of the work to further refine the OAN range towards the identification of a new housing requirement.</p> <p>Both councils will also give further consideration to the need for specific housing types such as executive housing, starter homes and student housing.</p>
IC026/258	Messer's Barbara Isaac, Geoffrey Downes and Joan Talbot.	<p>With regard to housing, our client notes the recent publication of the Strategic Housing Market Assessment (SHMA), and the need for a significant uplift in housing delivery to meet demographic change as well as meeting aspirations to deliver significant economic growth. It is considered in line with national policy, that the upper end of the OAN is used as the starting point for determining the housing requirement figure across the two authorities in order to boost significantly the supply of housing, and to allow the two authorities to better meet aspirations for economic growth. Using the higher end of the OAN as the starting point would also be more compliant with the National Planning Policy Framework.</p>	<p>Support for the higher end of the OAN range is noted.</p>

IC027/261	Keele Parish Council	<p>The data used in drafting the Joint Local Plan (JLP) has been informed by Newcastle’s Strategic Housing Review. Unfortunately a recent analysis of the 2015 Strategic Housing Review has revealed serious flaws in the analysis of data and it is clear that these errors are propagated the initial Joint Local Plan consultation document, with the result that there is a significant over-estimation of the number of houses the Borough needs to build. The Parish Council also consider some of the logic in this section of the JLP to be flawed. Some examples of this are cited below:</p> <p>“The lower end of the OAN range reflects the future growth in households from population influences. These include factors such as an ageing population in Newcastle-under-Lyme, high birth rates in Stoke-on-Trent and the number of people likely to move into the area or likely to leave to live elsewhere. This lower figure also takes into account the fact that over many years large numbers of young people have not been able to form households due to rising house prices exceeding young peoples’ incomes.”</p> <p>The SHMA specifically notes that depressed house prices in the area have hindered the development of building on brownfield sites. If house prices are depressed this contradicts the assertion that young people have been prevented from moving into the housing market by high house prices.</p> <p>“The upper end of the range takes into account the need not only to accommodate the changing population but to build enough houses to accommodate a sufficient number of workers to help ensure the area realises its full economic potential. This upper end of the range would require the retention and attraction of more people to move into the area, as there would not be enough working age population generated locally, particularly in Newcastle-under-Lyme due to its ageing population, to realise the potential for future job growth and it proposes to increase the housing supply to help the housing market return to affordability levels last seen in 2001.”</p> <p>If economic growth in the area were restricted by insufficient housing, the laws of supply and demand would suggest that housing prices would be high as is the case in other parts of the country. Yet local housing prices are acknowledged to be depressed and price inflation is low. Equally analysis of demographic data suggests that young people are leaving the area because there are no suitable jobs, NOT because there is no suitable accommodation. Other than in the short</p>	<p>The Issues Consultation Document and supporting technical papers have not been informed by Newcastle-under-Lyme’s Strategic Housing Review. The Strategic Housing Review was undertaken to inform Newcastle-under-Lyme’s draft Housing Strategy which is not a planning document.</p> <p>Whilst lower house prices will enable some households to purchase property, the SHMA identifies that because incomes are also lower many households are unable to purchase market housing. There are many reasons why young people have not purchased property and one of these is also the availability of finance from banks to purchase properties.</p> <p>Housing demand is distinctly different to housing need. Housing need is generated by existing and future households in the area that require properties to live in, whereas housing demand reflects households that make a choice to purchase property in the area. Higher demand can be generated by providing employment to encourage people to live and work in the area; however it can also be affected by a much wider range of factors such as the provision of healthcare, education and a high quality living environment. These are all factors which the Joint Local Plan will also need to address.</p> <p>As highlighted, there is evidence in the SHMA to suggest that younger age groups</p>
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		<p>term, building more houses will not create local jobs but may degrade the environment and depress local property prices further.</p> <p>“The current strategy of targeted regeneration has maintained a supply of housing but this has not been enough to meet needs due to market factors, including the high cost of bringing some sites forward.”</p> <p>This suggests there is insufficient demand for housing to support the cost of bringing sites forward. We do not consider that building more houses will increase demand without an upturn in the local economy, and although the JLP seems to consider that the act of building of new houses is enough to stimulate the economy we do not agree. The JLP states that:</p> <p>“Many people who live in the area commute outside the area to work.” And this supports our argument that the main issue is not housing supply but employment in the area.</p>	<p>have been moving out of the area because there are no suitable jobs. Additional economic growth is therefore required in order to provide jobs for this age group. For these additional jobs to be realised, further housing will be required to accommodate the younger age groups that would otherwise be living elsewhere. At the same time, as also highlighted, some of the existing workforce chooses to live elsewhere and commute in to the area for work. This is an unsustainable pattern and the Joint Local Plan will need to explore how people can be attracted to both live and work in the area. Both of these will result in a higher housing requirement.</p>
IC027/272	Keele Parish Council	<p>The Local Plan must demonstrate a five-year supply of housing land, and this cannot be achieved if the data and theories being used to assess the demand are exaggerating the requirement. So to protect the rural area the JLP must review the statistics and statistical analysis of the Strategic Housing Review.</p>	<p>The Issues Consultation Document and the supporting technical papers have not been informed by the Strategic Housing Review. In regard to the housing requirement and the five year housing land supply, both councils will continue to keep these and the evidence that informs them under review.</p>
IC029/282	Barratt Homes	<p>The Issues Consultation Document states (paragraph 2.23) that the cumulative shortfall against the Core Spatial Strategy targets stood at 841 dwellings as of 2015. We are not sure how the figure has been derived – in our assessment the combined shortfall across the two LPA areas is significantly higher. The shortfall figure should therefore be clarified in subsequent publications</p>	<p>The cumulative shortfall of 841 dwellings against the Core Spatial Strategy refers to performance against the housing requirements in Stoke-on-Trent. Paragraph 2.23 also sets out that Newcastle-under-Lyme has been unable to meet the Core Spatial Strategy annual housing targets since 2010/11, leading to a shortfall of 303 dwellings by 2014.</p>

IC029	Barratt Homes	<p>The evidence recognises that the lower end of the OAN range does not consider the economic trends across the plan area and therefore does not reflect the likely job growth required, with a likely consequent impact on the potential to realise the true economic potential across both authorities. That is an important point which will need to be afforded significant weight in setting the new housing requirements.</p> <p>Conversely, the upper end of the OAN range takes into account the need not only to accommodate the changing population but to build enough houses to accommodate a sufficient number of workers to help ensure the area realises its full economic potential. We concur with those comments.</p> <p>In summary, on the issue of housing need and dwelling requirements, the evidence documents acknowledge that at least 1,177 dpa will need to be delivered in order to meet the area's growing population, but the documents also recognise that at least 1,504 houses need to be built each year if the economy is to grow to its full potential and to enable young people to afford to get on the housing ladder. This evidence strongly points towards a housing target at or above the upper end of the OAN range (we note that the SHMA also includes an alternative OAN range of between 1,504 and 1,917 dwellings per annum, which is based on a greater retention/attraction of people).</p>	<p>Support for the higher end of the OAN range is noted.</p> <p>In regard to the higher range of 1,504 to 1,917 new dwellings per annum, this is referenced in the SHMA with a caveat that the Employment Land Review (ELR) will need to undertake refinement of this range. The ELR has since been completed and it advocates the application of the Cambridge LEFM, which results in the lower 1,504 figure that forms part of the OAN range. The 1,917 figure is derived from Experian forecasting.</p>
IC031/288	Renew Land Developments	<p>In line with aspirations to grow the economy, and make North Staffordshire a "net contributor" to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are suitably located in close proximity to shops, services, public transport and the strategic road network.</p>	<p>Support for the higher end of the OAN range is noted.</p>
IC031/291	Renew Land Developments	<p>Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising from the latest SHMA further, and explore other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth.</p>	<p>Support for further workshops and discussions are noted. Both councils recognise the need for further discussion and will consider when and how these could most appropriately take place within the Joint Local Plan preparation timetable.</p>
IC033/305	Severn Trent Water	<p>An objectively assessed need (OAN) for housing across both authorities of between 1,177 to 1504 dwellings per annum has been identified in the SHMA. It is considered that if the joint authorities seek to achieve ambitions of growing the economy and retaining its working age population then the upper end of the</p>	<p>Support for the higher end of the OAN range is noted.</p>

		range should be targeted in the Joint Local Plan.	
ICO34/312	Historic England	Para 2.17 – It is noted that the document states that the SHLAA's are not yet complete. As such it is recommended that the document acknowledges that key challenges relating to the various issues set out within the current document could potentially change should alternative options to deliver new housing be required. Such alternative options could potentially impact on the historic environment, amongst others.	It is understood by both authorities that further issues may arise during the plan preparation process. The completed SHLAAs will inform the preparation of the Strategic Options document. This will incorporate the consideration of alternative options for growth and development and the implications arising from each option (including effects on the historic environment).
ICO35/323	Mr Hussain (Knights)	In line with aspirations to grow the economy, and make North Staffordshire a “net contributor” to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued as a starting point, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are suitably located in close proximity to shops, services, public transport and the strategic road network.	Support for the higher end of the OAN range is noted. The type and location of sites to accommodate growth will be explored at the Strategic Options stage.
IC035/324	Mr Hussain (Knights)	Prior to the publication of the National Planning Policy Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is acknowledged at paragraph 2.21 of the Issues and Options Consultation paper. It is the opinion of Knights therefore that the higher level of housing need is more appropriate to address a previously suppressed housing market.	Support for the higher end of the OAN range is noted. The SHMA recognises the effect of the RENEW programme and has factored this in to the development of the OAN range.
IC035/325	Mr Hussain (Knights)	Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising from the latest SHMA further, and exploring other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth. Meeting the needs for other types of housing other than open market housing may increase the objectively assessed housing need figure further. A	Support for further workshops and discussions are noted. Both councils recognise the need for further discussion and will consider when and how these could most appropriately take place within the Joint Local Plan preparation timetable. It is not considered that meeting the needs for other types of housing will increase the OAN range as the SHMA already

		further review of the SHMA, along with further workshops are therefore considered to be essential to avoid any unnecessary delay in having an adopted plan in place.	considers the needs for a wide range of housing types. Both councils will however continue to review all relevant evidence and ensure that it is up to date, including the SHMA.
IC036/328	Renew Land Developments	In line with aspirations to grow the economy, and make North Staffordshire a “net contributor” to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are suitably located in close proximity to shops, services, public transport and the strategic road network.	Support for the higher end of the OAN range is noted. The type and location of sites to accommodate growth will be explored at the Strategic Options stage.
IC036/329	Renew Land Developments	Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising from the latest SHMA further, and explore other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth.	Support for further workshops and discussions are noted. Both councils recognise the need for further discussion and will consider when and how these could most appropriately take place within the Joint Local Plan preparation timetable.
IC037/333	Mr C Taylor and Mr S Taylor	In line with aspirations to grow the economy, and make North Staffordshire a “net contributor” to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are suitably located in close proximity to shops, services, public transport and the strategic road network.	Support for the higher end of the OAN range is noted. The type and location of sites to accommodate growth will be explored at the Strategic Options stage.
IC037/334	Mr C Taylor and Mr S Taylor	Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising from the latest SHMA further, and explore other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth.	Support for further workshops and discussions are noted. Both councils recognise the need for further discussion and will consider when and how these could most appropriately take place within the Joint Local Plan preparation timetable.
IC038/338	TFK Property Limited	In line with aspirations to grow the economy, and make North Staffordshire a “net contributor” to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued as a starting point, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are	Support for the higher end of the OAN range is noted. The type and location of sites to accommodate growth will be explored at the Strategic Options stage.

		suitably located in close proximity to shops, services, public transport and the strategic road network	
IC038/339	TFK Property Limited	Prior to the publication of the National Planning Policy Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is acknowledged at paragraph 2.21 of the Issues and Options Consultation paper. It is the opinion of Knights therefore that the higher level of housing need is more appropriate to address a previously suppressed housing market.	Support for the higher end of the OAN range is noted. The SHMA recognises the effect of the RENEW programme and has factored this in to the development of the OAN range.
IC038/340	TFK Property Limited	Given that OAN is often a matter of contention at Local Plan Examinations, it is considered that further workshops and round the table discussions are held with stakeholders and the development industry to explore all of the matters arising from the latest SHMA further, and explore other areas of housing need, including executive housing, starter homes and student housing in particular in more detail in order to ensure that the Council has a robust starting point, following which it can begin considering broad locations for further housing growth.	Support for further workshops and discussions are noted. Both councils recognise the need for further discussion and will consider when and how these could most appropriately take place within the Joint Local Plan preparation timetable
IC038/344	TFK Property Limited	It is acknowledged that any outward growth of Stoke-on-Trent and Newcastle-under-Lyme would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN housing figure as well as employment allocations.	The potential distribution of development is not explored at the Issues consultation stage. This will follow at Strategic Options when further issues such as encroachment in to the countryside/Green Belt will be highlighted.
IC039/346	Mr A P Thompson	The % split between the two councils needs to be identified. Last year it was reported in the press that SOT was to build the housing stock requirement of Cheshire East. This is not mentioned in the plan and if correct changes everything.	The potential distribution of development, including the capacity of both areas to accommodate development, will begin to be explored at the Strategic Options consultation stage.
IC045/367	Stafford Borough Council	The Consultation document states that higher levels of housing development needs have been identified than in previous plans. Therefore, it is likely that there will be a need to increase the number of new homes built in the Plan Area. In accordance with the NPPF these needs should be met within the defined Housing Market Area, which we note excludes Stafford Borough.	Both authorities note Stafford Borough Council's acknowledgement of the issues raised during this consultation stage.
IC063/465	Judith Oppenheimer	NuL's need during the Plan period is not for attempts to manipulate the housing market as proposed in the SHMA, but for transformative change, starting not with housing but with education and skills.	Both councils do not consider that the SHMA attempts to manipulate the housing market. It is considered that the SHMA

			has been undertaken in accordance with national planning policy. Both councils acknowledge the need for transformative change and especially to improve the education and skills of the workforce. This is highlighted under issue 6 of the economy theme within the Issues Consultation Document.
IC059/429	Malcolm Johnson	<p>I believe that the whole evidence provided by N-u-L Borough Council is flawed as it contains serious mathematical and statistical interpretation errors. Any Local Plan based on this information will be worthless. For example:</p> <p>Newcastle Draft Housing Strategy (p21):</p> <p>"The population of Newcastle under Lyme is 125,000 (2015) and by 2030 is estimated to grow to approximately 130,000 a 5 % increase at approximately 1.5 % per year."</p> <p>ERROR: The growth is exactly 4% and the rate of growth is 0.265% per year - The statistics OVER-estimate the growth 6 times. Has nobody checked the maths on any of these statistics? N-u-L Strategic Housing Review 2015:</p> <p>This document is totally inaccurate in both its data and conclusions. Table 3 (pages 5–6) comparing the population change by census age groups has a simple error which has then been compounded by someone attempting to interpret the figures as if they were accurate. The final column (% difference when compared to total change) shows the difference for each age group as a percentage of the total difference. These figures are inaccurate because they have been moved up one row in the final column.</p> <p>The paragraph following the table makes comments based on the inaccurate data e.g. it states that "There has been a significant decrease in children (residents from the age of 0 to 16) which have decreased by 87%". In fact, the number should be 7.3%. All the assumptions are as inaccurate and therefore any decisions based upon them will be totally worthless.</p> <p>Table 2 shows household composition and claims that "There has been a significant in increase in one person households. From 2001 to 2011, total households increased by 1,836, 96% of this increase is attributable to an increase in one person households."</p>	These comments are not relevant to the Joint Local Plan Issues Consultation Document; they are instead relevant to the Draft Newcastle-under-Lyme Housing Strategy which was subject to a different consultation exercise.

		If the data is accurate, (and there are now doubts about this), it is the percentage of the TOTAL change and not the FINAL RESULTING change which is significant. The increase in single person households accounts for 62% of the change; not 96%. Single family households have declined and account for 18% of the total change but the increase in "other" households accounts for 20%.	
IC062/447	Marshall Fear	SHMA has identified an objectively assesses need (OAN) ranging from 1,177 to 1,504 dwellings per annum across both authorities between 2013 and 2039. As mentioned in the consultation document, this is well above the requirement previously set out in the Core Spatial Strategy which had an indicative annual target for 855 dwellings across both areas. There is no clear explanation as to why the figures differ so much. The population changes, the need to help young people to be able to afford to buy a house and the fact that people are now living longer should all have been taken into account as part of the CORE spatial Strategy?	The Core Spatial Strategy housing requirement and the SHMA OAN range are derived from different methods. The Core Spatial Strategy figure was derived from the revoked West Midlands Regional Spatial Strategy which involved a process of political negotiation to determine how much housing should be accommodated within each authority. The OAN is an objective assessment of housing needs, which means that it is not influenced by council policy or any political interest. The OAN also needs to be distinguished from a plan requirement such as that contained within the Core Spatial Strategy. The OAN provides the evidence to begin identifying what the new housing requirement will be within the Joint Local Plan and this will replace the previous housing requirement contained within the Core Spatial Strategy. Before that happens, both authorities will need to consider how much development could potentially be accommodated within both areas and this will be explored at the Strategic Options stage.
IC063/470	Judith Oppenheimer	It is also essential for NuL to have a Local Plan that enables it consistently to demonstrate a five-year supply of housing land. NuL should not plan for more housing development than its recent planning history demonstrates that it can realistically deliver. Without this, development will continue to be developer led, not plan led; the Joint Local Plan will be unenforceable; and NuL will find it difficult to protect its rural area.	A key test of the Joint Local Plan at examination will be the ability to demonstrate a 5 year supply of deliverable housing sites. The housing need evidence provided by the SHMA is the starting point for this and this does take account of past rates of housing delivery in both areas. The Strategic Options stage will begin to

			explore how the identified need could be accommodated in both areas.
IC067/496	Christopher Preece	<p>School Sites/ Locations.</p> <p>Schools up to 11 years old.</p> <ol style="list-style-type: none"> <li>1) School sites should have good road access.</li> <li>2) Catchment areas should be curtailed to encourage walking to school.</li> <li>3) Pupil numbers should be limited.</li> <li>4) Additional capacity should be available in schools to accommodate any emergency increase in pupils.</li> </ol>	The provision of school places required to support different levels and locations of housing development will be explored at the Strategic Options stage.
IC068/503	Gary Deane	<p>Support the Councils findings that: At least 1,177 houses per annum (pa) are required to meet the growing population and ensure that people can access local housing.</p> <p>A minimum of 1,504 houses pa will be needed to ensure the economy grows to its full potential and local people can access the housing market</p>	Supporting comments noted
IC071/519	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>Across the two authorities the economy is currently well below expectations assumed, erroneously, in the SHMA but this is recognised in the Economy section of the Consultation documents.</p> <p>So far the original Core Spatial Strategy figure has not been achieved. Unless there is a properly costed and funded long term scheme in place to rejuvenate the local economy, it is naive to assume that the population will rise in line with national statistics, i.e. no job prospects equals no inward migration.</p> <p>The SHMA has identified a need for between 1,177-1504 dwellings per annum across Stoke on Trent and Newcastle under Lyme. These figures do not seem to reflect any of the current or projected statistics that have been provided in the housing requirement forecasts from the Core Spatial Strategy (CSS) 2009 (855 dwellings per annum 2006-2026) or the 2012 SNHP (published Feb 2015, stating 691 dwellings per annum).</p> <p>Data from the ONS predicts a population increase from 2011-2021 of 5.2% in the area; of that a significant proportion will be aged over 65. There is no link provided to any evidence from the Experian, Cambridge Econometrics and Oxford Economics on economy or employment forecasts that provides any</p>	<p>Both councils recognise the need to balance the provision of new homes and jobs to ensure that growth is sustainable. The comment regarding the identified 'skills gap' is more to do with the education and training of the existing workforce rather than a growth in the workforce - although it is recognised that importing labour from elsewhere can help to plug a skills gap but this is considered an unsustainable option.</p> <p>The SHMA has taken in to account the 2012 SNHP and the previous Core Spatial Strategy in determining the most appropriate OAN range. A shortcoming of the 2012 SNHP is that it only takes in to</p>



		<p>transparent evidence to conclude that a 58% increase in housing is required in the borough. The Joint Employment Land Review, section 3.19, states that Stoke on Trent's "skills gap" is harming the city's growth prospects. This is evidence that there isn't an increase in the prospective job market in the area to currently support a 58% increase in dwellings.</p> <p>The figures projected from the SHMA for the number of dwellings required seem highly unrealistic and there appears to be no transparent evidence provided in the Joint Local Plan paper, Housing Technical Paper, SHMA or supporting evidence to support this dramatic increase in housing compared to previous projected figures.</p> <p>If the ONS projected household increase for the borough is applied to Loggerheads parish we calculate that with built properties for sale and current planning consents granted we already have 14 years of this requirement.</p> <p>The basis of the SHMA is seriously flawed as ONS and other information has been applied incorrectly.</p>	<p>account the preceding five years of population and household growth. The SHMA has applied a longer term view over the preceding 10 years which has resulted in a higher figure than the 2012 SNHP. This longer 10 year period also covers the Core Spatial Strategy plan period and it allows a comparison that shows how population has been growing at a higher rate than housing completions. There is therefore an unmet need for housing which has been factored in to the calculation of the OAN range, which is higher than the previous CSS housing target.</p> <p>The 5.2% increase in population between 2011 and 2021 that is quoted in the comment is taken from the 2011-based interim population projections, which have now been superseded by the 2012-based projections.</p> <p>The comment relating to Loggerheads is a matter to be considered outside of the Issues consultation, however both authorities do not advocate applying the 5.2% figure to any part of the plan area</p>
IC071/520	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>It is clear that the theoretical targets for the delivery of new housing are impaired by [a] lack of demand due to an inability by some potential purchasers to secure the funds necessary to purchase [b] lack of funding to enable RSLs to produce new-build housing and [c] the low value property market across the whole area, even in rural areas. These factors are coupled with the potential costs associated with the reclamation of land previously used for commercial purposes [brown field land]; there is also land within the Kidsgrove and Stoke on Trent areas which has been affected by historic shallow surface mining for coal.</p>	<p>These comments largely relate to the viability of bringing forward housing schemes. This is an issue that both councils recognise and are undertaking further work in order to determine how and where housing development could realistically be achieved. This will be explored further at the Strategic Options stage.</p>

IC071/521	Karen Watkins (Loggerhead s Parish Council & Neighbourho od Plan Working Group)	It is quite clear to us that the OAN derived bears little or no relationship to the real world. It has assumed flawed conclusions regarding employment and other factors affecting housing need and it is clear from the numbers of new-build housing achieved since 2006 that even the annual target of 855 dwellings set out in the Core Spatial Strategy was an over estimate and should clearly be revised downwards.	The deliverability of housing development is an important consideration that will need to be fully understood before a preferred policy approach is applied. This will be derived from the SHLAA work which is underway and will be explored further at Strategic Options. Both councils will keep all evidence relating to the OAN under review to ensure that it is based on up to date assumptions, including employment need.
IC071/522	Karen Watkins (Loggerhead s Parish Council & Neighbourho od Plan Working Group)	<p>The population analysis for Stoke on Trent and Newcastle under Lyme is noted, but the number of houses to be built cannot be realistically established until there is firm evidence of plans for economic growth being in place and delivering economic growth as forecast. Only then would it be possible to assess the number and tenure types of properties required.....</p> <p>To ensure sustainability future development of housing must be close to or inside the urban area and not located where it will encourage an excessive number of single-occupancy car journeys to/from work. Paragraph 2.16 is very relevant in this regard.</p>	The SHMA and the ELR have together undertaken a detailed assessment of the likely future needs for housing and economic growth. The councils consider that these studies remain as the best available evidence for identifying these future needs. This evidence will be continually reviewed and updated as work progresses on the Joint Local Plan.
IC071/523	Karen Watkins (Loggerhead s Parish Council & Neighbourho od Plan Working Group)	We are firmly of the belief that at present even the original Core Strategy housing requirement estimates were too high, as explained above. Paragraph 2.20 confirms that even this is dependent on untried and untested unknown factors.	The SHMA has considered performance against the previous Core Spatial Strategy plan target and found that development may have previously been constrained by the Housing Market Renewal programme more than any other factor. The new housing need scenarios have been calculated in an 'objective' manner which does not take account of existing or future planning policy. Whether or not the housing need scenarios identified in the SHMA could be achieved will be explored at the Strategic Options stage.
IC071/525	Karen Watkins (Loggerhead s Parish	Both Councils should consider using financial reserves to provide the cash-flow required to carry out the remedial work required on the brown field sites before bringing them to the market as ready development sites. In the alternative, Newcastle under Lyme owns a large acreage of potential housing development	Both councils recognise that they have a role to play in supporting the delivery of new housing, however any financial contributions that the councils make must

	Council & Neighbourhood Plan Working Group)	land both in and adjoining the urban area. These sites are well served by public transport and community facilities already and could be released to the housing construction market. Part of the proceeds could then be used to bring about much needed improvements to community facilities in deserving locations with the balance of the proceeds of sale used to the benefit of Council Tax Payers.	be considered outside of the Joint Local Plan process. Planning officers from both authorities will work with their respective property teams to determine what sites they wish to be promoted within the Joint Local Plan.
IC071/527	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	Until improved plans are approved, costed and tested it is premature to consider a housing needs assessment. The development market is unlikely to assist with this until it has proof of security of the considerable forward investment required.	Viability and the costs of development are being considered and will be explored at the Strategic Options stage.
IC071/528	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	References to the shortfall between the number of dwellings given planning permission and completed housing units delivered in both Authorities illustrates a substantial error of logic within the NPPF. The issue of a planning consent in the area is not related in any way to the delivery of occupied units. That is controlled by the market which is in turn controlled by economic development and the delivery of facilitating infrastructure and financial incentives. Until that economic improvement has been secured and delivered, it is naive to speculate on housing numbers likely to be required.	The Joint Local Plan will provide the local planning framework to guide future development, including housing and economic development. It will need to be undertaken in accordance with the NPPF and it is not the role of this consultation to critique national planning policy. The NPPF does take account of market forces and paragraph 47 requires local planning authorities to apply an additional 5% buffer to their housing requirements 'to ensure choice and competition in the market for land'. The deliverability of housing sites is an important issue. Both councils are preparing new SHLAAs which will explore this and this will be explored at the Strategic Options stage.
IC071/529	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	The annual housing completion figures quoted are meaningless without the determination of the split between houses provided by the private sector and those provided by local and central government funding. Only then will you derive a true picture of housing provision. The slight apparent improvement in the Loggerheads area is accounted for in a large part by the acceptance of discounts by vendors, many of whom have to move away from the area due to	Local or central government funding for new housing has largely been in place to support the delivery of affordable housing. In the vast majority of cases private market housing does not attract government funding.

	od Plan Working Group)	employment requirements.	It is not clear from the comment what improvement has taken place in Loggerheads - does this refer to delivery of new housing or sales and prices of properties? Whether or not vendors have accepted lower prices for their properties is not a matter for the Joint Local Plan to address unless it is demonstrably a longer term indicator of the performance of the property market.
IC072/553	Dean Lewis (Tim Dean)	The Consultation Document is incorrect when it discusses an OAN range. The lower end of the range is no an OAN, it is merely the results of the first stages of the OAN. Population and household projections and potential variations of these projections is only part of the OAN process. LPA must then consider market signals and the potential for future job growth. When these are considered it results in a full OAN in excess of 1,500 dpa and potentially up to 1,900 dpa.	The higher range of 1,504 to 1,917 new dwellings per annum is referenced in the SHMA with a caveat that the Employment Land Review (ELR) will need to undertake refinement of this range. The ELR has since been completed and it advocates the application of the Cambridge LEFM, which results in the lower 1,504 figure that forms the top end of the OAN range. It is therefore not appropriate to include the 1,917 new dwellings per annum figure within the OAN range.
IC072/555	Dean Lewis (Tim Dean)	<p>Whilst the RENEW programme has sought to rebalance the housing stock of the HMA, its extensive demolitions have constrained population growth and household formation.</p> <ul style="list-style-type: none"> <li>□ The SHMA is seeking to reverse some of the trends associated with the RENEW programme and the recession which is laudable. Although, past demographic trends will be insufficient to deliver the employment generated in the HMA over the next 26 years. Uplift to the OAN is therefore critical.</li> <li>□ The Council has assessed affordable housing but has not assessed the likelihood of its delivery or whether an increase to the OAN might be required to accommodate this.</li> <li>□ The SHMA assesses two economic forecasts from Cambridge Econometrics and Experian. Once the increase in HRRs is made, this produces a housing need range of around 1,500 dpa to 1,900 dpa. The SHMA discounts the upper of this economic scenario range without any justification or rationale.</li> </ul>	<p>Acknowledgement of how the RENEW programme has been considered within the SHMA is noted.</p> <p>The SHMA does not rely on past demographic trends to support future economic growth. Past trends are just one variable in the calculation of future trends. As a result, no uplift to the OAN is considered to be necessary.</p> <p>In line with the PPG, the need for affordable housing is undertaken using a different methodology. The likelihood of being able to deliver affordable housing will be explored at the Strategic Options</p>

			stage.  The justification for discounting the Experian economic forecast is set out in the Employment Land Review, not the SHMA.
IC072/556	Dean Lewis (Tim Dean)	Overall the SHMA has concluded that the demographic starting point is 691 dpa rising to 1,177 dpa taking into account alternative demographic assumptions and the potential for improvements to the market. The economic scenarios range is between 1,500 dpa (Cambridge Econometrics) and 1,900 dpa (Experian). Given the ELR chooses the Cambridge Econometrics forecast as its preferred forecast it is likely that the OAN will be a minimum of 1,500 dpa.	Comments noted.
IC072/557	Dean Lewis (Tim Dean)	Moreover, Some of the economic assumptions utilised by the JLP authorities' consultants in their assessment of housing need is questionable. While their commuting assumptions appear to be robust, there is a case for undertaking additional sensitivity analysis with respect to the assumptions that are made regarding future economic activity rates, particularly for older female workers.	It is unclear exactly what additional sensitivity testing is being suggested. Why have older female workers been specifically highlighted? It is not possible to provide a response to this comment due to the insufficient information provided to support this view. However both councils will continue to review the evidence in the SHMA as part of the plan preparation process.
IC072/558	Dean Lewis (Tim Dean)	There is also a concern that the assumptions made in the SHMA about future rates of unemployment in the JLP area are likely to be too conservative. This is because recent ONS data indicates that the trajectory of change for reduced unemployment rates in Newcastle-under-Lyme is lower than the unemployment rate predicted by the SHMA. There is similar evidence emerging that unemployment rates in Stoke-on-Trent are also trending lower than the levels predicted by the SHMA. All this implies that the local labour market may be more constrained for the majority of the plan period than the SHMA is expecting, which in turn implies that there may be need for additional housing over and above the levels predicted by the SHMA.	The alternative view on unemployment rates is noted. Both councils will consider the implications of this and will continue to keep all evidence (including the SHMA) under review
IC076/574	W Naylor	This is the least clear part. The projections for housing demand seem difficult to get right. Too many factors perhaps which cannot be predicted into the future.	Planning Practice Guidance recognises that 'Establishing future need for housing is not an exact science. No single approach will provide a definite answer'. The guidance also attaches significant weight to housing need assessments

			contained within SHMAs and both councils are of the view that the Joint SHMA provides the most considered and robust assessment of future housing needs. This will however continue to be kept under review to ensure that it is up to date and takes account of all relevant variables.
IC080/610	Nicky Davis	There is too much housing being built without enough school places. If housing is built more schools should be too. I know the school issue is difficult because of the government's policy to take schools out of local authority control, but we really must protest to government or refuse planning for housing unless there are schools, especially primary, built with these new estates. It can be done, it has with new housing in Stafford, so we should too.	Comment noted. The provision of school places in connection with housing and population growth will start to be explored at the Strategic Options stage.

**Issue 2 : Outmigration and Natural Population Decline**

ID Number	Consultee	Consultee Comments	Officer Comments
IC009/61	Councillor Derek R Davies - NDP Steering Group	Demographic data for NuL indicates a dying town. Graduates and mid-career people are leaving the area. This indicates a low-skill, low-wage economy. The student population (18-24 age group) is entering and leaving via a revolving door. Out-migration in the 25-44 age group contributes to (1) declining birth rate, (2) out-migration of existing children. NuL's need during the Plan period is not for attempts to manipulate the housing market as proposed in the SHMA, but for transformative change, starting not with housing but with education and skills.	Improving the skills and education of the workforce to a level that is more aligned with the needs of business may contribute towards reducing outmigration. But this would still result in a higher need for housing in order to accommodate households that would otherwise have left. This is highlighted as the second key challenge under Issue 2. Both councils are strongly of the view that the SHMA does not attempt to 'manipulate' the housing market. Rather it has tested different scenarios for future housing growth which would constitute sustainable development. This has been undertaken in

			accordance with national planning policy.
IC013/179	Staffordshire Chambers of Commerce	It is important to address outmigration and out commuting as this will impact on business growth and investment. To attract and retain a skilled workforce, the area needs an ongoing supply of high quality housing stock that meets the needs and aspirations of people living in the area and those looking to move to the area for employment opportunities. The housing mix needs to include a wide range of properties, from affordable to high-end executive homes.	The support for reducing out migration and delivering a wide range of housing in order to achieve this is noted.
IC029/285	Barratt Homes	The evidence confirms that, unlike neighbouring authorities, there remains a net out-flow of population from Stoke-on-Trent to other areas of the UK. That is a worrying statistic and the new Local Plan must therefore aim to halt and then reverse this trend, which means making provision to deliver sufficient homes and jobs in locations that are attractive to the market.	Recognition of the issue of outmigration is noted. Support for addressing this issue through the provision of sufficient homes and jobs is also noted.
IC062/448	Marshall Fear	The document identifies that net out flow of population within Stoke on Trent is still an issue. Do we have statistics saying where people are moving too and why people are choosing to move away? Would a regional development plan help address this issue?	Figure 2.3 in Appendix 2 of the SHMA identifies that the strongest net outflows from Stoke-on-Trent are to Staffordshire Moorlands and Newcastle-under-Lyme. The latter is within the Joint Local Plan area and so the new plan can address this aspect. Further discussion with Staffordshire Moorlands District Council will be required under the Duty to Cooperate as the plan develops. Regional planning has now been revoked so a regional plan is not an option. Both local authorities are already working to address these issues at a strategic level across the housing market area and this is in accordance with current national planning policy. The reasons behind the outmigration are explicitly identified within the SHMA but there can be a range of factors including the quality of living environments, having the right type and amount of housing and having the right employment offer.

IC071/526	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	The key challenge will indeed involve major improvements over time to generate economic competitiveness that should go some way towards retaining residents in the area. This will exclude University Students who only stay in the area whilst studying.	Support for retaining residents through improved economic competitiveness is noted. Whilst university students may only live in the area temporarily whilst studying, the SHMA provides evidence to suggest that graduates are leaving after studying to live elsewhere. Providing jobs to retain graduates may therefore be a way of ensuring balanced economic and housing growth.
IC071/544	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>The economy within the Rural South differs dramatically from the traditional Mining and Heavy Engineering that dominated the urban areas of Stoke-on-Trent and Newcastle-under-Lyme. The predominant industry within the Loggerheads Parish area is Farming and Agriculture.</p> <p>Due to the limited amount of job prospects in the Loggerheads area the majority of residents commute to these places of work, with the majority travelling into the urban area. As a consequence, housing developments over the last 30 years have concentrated on family homes and the 1st time buyer has largely been ignored. This is because; developers' profits appear to have dictated the types of house that has been built within the area. In addition, the wholly inadequate public transport links, within the Rural South area, has made it impossible for the young to buy in the area as there is a total reliance on the car for transport.</p> <p>The result of this situation is that the population within the Loggerheads area has aged significantly, in recent years, as the young cannot afford to get on the housing ladder in this area.</p> <p>For the future, 3 things must happen if a younger work force is going to consider a move to the Loggerheads area.</p> <ol style="list-style-type: none"> <li>1. Future developments must be predominantly aimed at the 1st time buyer and housing developers must not be allowed to concentrate on the family home.</li> <li>2. Public transport to the rural area must be improved dramatically, to the point where the young can travel to their place of work without incurring ridiculous time penalties.</li> <li>3. Small business should be encouraged to move into the area so that shop assistant and bar staff is not the only jobs available to the young.</li> </ol> <p>Finally, if the economy is to prosper in this area and we are to achieve a more balanced population; the Newcastle-under-Lyme Planning Department must</p>	The issues raised are significant and do highlight some considerations in regard to the sustainable development of the rural area. In particular the comments highlight the need for balanced housing and economic growth in order to reduce commuting patterns. Further evidence will be required in order to identify the most appropriate housing types and the transport improvements to be delivered in the rural south. As a Neighbourhood Plan is in preparation for Loggerheads then the evidence to support that plan is the most appropriate to draw from. The Neighbourhood Plan can set policy for the housing mix which is appropriate for the NP area.



		stand firm against the developers' race for profit and insist on a housing balance that has the area's best economic interests at heart.	
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**Issue 3: Delivering new homes and strengthening the local housing market**

Reference	Consultee	Comments	Officer Comments
IC002/3	St Modwen	<p>The allocation of land at Berry Hill has the potential to strengthen the local housing market considerably, and aid recovery within the area. The land at Berry Hill, if developed comprehensively, could also potentially contribute significantly to key infrastructure e.g. the Hanley Bentilee Link Road. The Hanley Bentilee Link Road is listed within the Transport Technical Paper as being a means of achieving better linkages to the east, and is a key infrastructure project supported by the two Local Authorities and will be an important item within the future Infrastructure Delivery Plan as the JLP progresses. Land at Berry Hill represents a form and scale of development that has the means of contributing towards this Link Road, as opposed to smaller sites that will be limited by the CIL Regulations to just five individual sites being able to contribute to key infrastructure items because of pooling restrictions. Economies of scale lend themselves towards larger strategic sites like land at Berry Hill.</p> <p>The JLP area is viewed 'as a viable commuter location given its rail and motorway link to other centres' (Housing Technical Paper paragraph 4.10) and therefore the attraction of a key strategic site such as land at Berry Hill potentially being able to contribute towards key infrastructure items that enhance these transportation links, should be viewed positively by the Authorities in preparing this JLP.</p>	Comments noted. The broad locations where future housing development may be located will begin to be explored at Strategic Options.
IC002/4	St Modwen	<p>We note that the Council's evidence base (Housing Technical Paper paragraph 4.12) suggests that there is a need to readdress the housing mix and deliver more detached dwellings that in turn can attract residents from a higher socio economic profile. Stoke on Trent has a lower than average number of detached homes, when compared to regional and national data. The ability to address this can best be achieved through the delivery of large scale sites like Berry Hill, that have opportunities to create a mix of new homes across a range of sizes, types and tenures, that can be fully integrated to create a mixed</p>	<p>Support for strengthening the housing market and improving the living environment of the area is noted.</p> <p>Paragraph 4.12 of the Housing Technical Paper does not state that there is a need to provide more detached housing. It simply states what the existing housing</p>

		<p>community, but introducing significant new detached, higher value homes into the area.</p> <p>This can attract inward investment to the area too, as people who may look to move here seek higher value accommodation, and equally, those investing in business expansion and relocation will look to ensure that there is a ready available supply of new, higher value homes to which they can attract employees to relocate to the area, and reside within.</p> <p>Creating the right environments, where people want to live, will help to address the outflow of population that has been experienced in the JLP area, where young, qualified people in particular are leaving their local Universities in search of new homes and jobs elsewhere. The JLP needs to reverse this trend, strengthen the local housing market, and through the inward investment of national companies like St Modwen, spearheading the delivery of new homes is one way of achieving that.</p>	<p>stock comprises of.</p> <p>The location and types of housing to be delivered by the Joint Local Plan are policy choices that will be explored at the Strategic Options stage.</p>
IC005/22	St Modwen	<p>This issue contains references to economic viability of delivering residential sites. It is considered that this is a key concern as the delivery of residential land is often the only viable reuse of brownfield sites.</p> <p>There appear to be some relative assumptions in the Plan regarding viability. It is recommended that a plan-wide viability assessment is undertaken by the Councils and through engaging with local developers, potentially at a roundtable discussion. Development viability is a critical issue within the joint area and needs to be carefully considered, with input from the development sector, to ensure delivery of the joint Plan.</p> <p>The next iteration of the development strategy should include strategic allocations for residential use based generally on a brownfield-first approach (where possible) and should identify sufficient land to meet the housing requirements.</p> <p>It is also important to recognise that brown field sites will not necessarily provide for all the housing needs and/or housing types government is calling for to be delivered. This means that “executive” style higher value housing and other aspirational housing is not necessarily appropriate or deliverable on inner urban sites. The Joint Local Plan should not preclude the development of greenfield/Green Belt so as to deliver the range of housing needed to meet all needs as part of a balanced portfolio. Such a balanced portfolio is essential to meeting the economic growth strategy.</p> <p>Land at the former Victoria Ground, the former Royal Doulton Site and the former Wades site could contribute to meeting the housing requirement within the joint authority area.</p>	<p>Preference for a brownfield first, but balanced development strategy that promotes a range of housing and development sites is noted. The councils will begin to explore the future development strategy at Strategic Options and will apply a preferred strategy a draft plan and final plan stages.</p> <p>A plan wide viability assessment will be considered at a later stage in the plan preparation process, when the development strategy and planning policies have become more developed.</p> <p>Both councils support the need for further engagement with the development industry and will ensure that this continues to happen as work on the Joint Local Plan progresses.</p>

		<p>It is noted that the former Victoria Ground, and former Wade's sites, despite previously being used for sport/employment uses, have not been included in the Employment Land Review (ELR) undertaken by Nathaniel Lichfield and Partners (NLP), December 2015. This indicates, correctly, within the districts and have not been recommended for retaining employment use. It is recommended that these sites are allocated for residential use in order to ensure that development can be brought forward.</p> <p>The former Royal Doulton site has been identified within the ELR but it has been assessed as average grade, constrained by the Conservation Area and nearby housing, and therefore more suitable to be considered for mixed use development with an element of retail led employment. The assessment of the constraints is accurate, however it is unknown at this stage is any element of employment use would be viable. The conservation area was extended to include parts of the former Royal Doulton buildings, those buildings have subsequently been removed and as such the conservation area boundary needs to be reviewed. It is therefore recommended that the site is considered for residential allocation with the potential for retail led employment generating use, subject to further market and viability testing.</p> <p>We are keen to work with the LPA to deliver viable schemes for the sites.</p>	
IC009/62	Councillor Derek R Davies - NDP Steering Group	The viability of brownfield land remains a significant issue in SoT and NuL (para. 2.22 Joint Local Plan). With the RENEW program no longer existing, developers have no incentive to develop this brownfield land. Until the Borough Council come forward with a coherent strategy to address this regeneration of the area, it will continue to remain unattractive to investors, developers and employers.	Recognition of the viability of developing brownfield land is noted. The future development strategy will begin to be explored at the Strategic Options stage and will become more fully developed at the draft plan and final plan stages.
IC009/63	Councillor Derek R Davies - NDP Steering Group	SoT and NuL need to address their housing strategies' completion rates. A weak housing market in the area has impacted on the number of houses that have been built. There is also a significant gap between the number of dwellings given planning permission and then completed from 2006/2007 to 2014/2015.	Recognition of the weak housing market impacting on the delivery of approved housing developments is noted. The councils will continue to explore how the delivery of approved schemes can be supported through the Joint Local Plan.
IC009/81	Councillor Derek R Davies - NDP Steering Group	<p>Looking at the linkage between housing and the economy, as detailed in the Issues consultation, there is a workforce preference for more central locations with good access to public transport links; and participants in the stakeholder consultation highlighted that employment sites accessible only by car are no longer a preferred business option.</p> <p><input type="checkbox"/> The provision of housing within the urban areas should be noted as a priority when assessing future need.</p>	These comments relate to the future distribution of housing development which both councils will begin to explore at the Strategic Options consultation stage. The preference for urban led development is noted.

		<p>□ It is difficult for a reader of the Issues consultation to comprehend why NuL and SoT would advocate building housing in the countryside when all the evidence points to the need to attract a workforce that is located close to the urban economy.</p> <p>□ The challenge here is to persuade developers, who have a preference to build unsustainable houses in more affluent areas in order to maximise their own profits, to build housing in locations where it will support and complement the local economy. The Issues consultation does not address how the LPAs will “tempt” developers to develop within town or city boundaries so as to house a future urban-type of workforce to meet economic needs.</p>	
IC011/137	Thistleberry Residents Association	<p>What is meant by a weak housing market? Given the number of empty homes in Newcastle Borough alone (1800 at the last count), it would appear that building even more houses is not necessarily the only solution. The Draft Plan is almost reticent to silent about the ways in which it is going to bring empty houses back into commission. The current rate of 75 per annum is far too (s)low.</p> <p>Housing satisfaction is related to economic circumstances and location. We fail to see how bedsits in Newcastle town centre are going to realise the aims and objectives set out in this Draft Plan for both housing and social engineering. Newcastle is not London.</p>	<p>A weak housing market relates to a relatively low sale value of new housing which can affect the financial viability of bringing forward new development schemes.</p> <p>In regard to empty housing, both councils recognise that bringing these back in to use will provide an important contribution in meeting the need for housing. The policies that could be applied in bringing empty homes back in to use will begin to be explored at the Strategic Options consultation stage.</p>
IC011/139	Thistleberry Residents Association	<p>Targeting areas for regeneration whilst seemingly sensible can also be problematic particularly when it is the same areas which receive public money continuously with little to show for it in terms of regeneration and/or improvement. This is often to the detriment of other areas. Again statistical evidence seemed absent to justify which areas are in greatest need. We would also like to know which areas have received what over the last 20 years. The need for regeneration should not always be based on the socio-economic position of individuals but also upon the amenities, infrastructure, and housekeeping needed to keep an area viable and pleasant to live in. If despite injections of large sums of money the area does not improve then the aid should be withdrawn or serious investigations made re the use of public funds. Certain areas should not be bottomless pits for public or surplus money. People who live in such areas should also make an ‘investment’ in some form.</p>	<p>Comments regarding targeted regeneration are noted, however the questions relating to where public funds have been directed is outside the remit of the Joint Local Plan.</p> <p>Development needs to be sustainable and this encompasses matters such as living environments, amenities/services and supporting infrastructure. These matters will be explored further at the Strategic Options consultation stage.</p>

IC012167	Keele University	Viability is, as recognised at para. 2.22, a potential impediment to the delivery of new housing. Too often, the requirement to demonstrate whether or not a development is viable arises at a relatively late stage in the planning process. The issue of viability needs to be addressed at an early stage of the process and the Local Plan should make this clear.	Recognition of viability issues is noted. Both councils will continue to assess the viability of future development through the preparation of the Joint Local Plan.
IC012/168	Keele University	<p>It is appropriate to consider whether or not targeted regeneration remains the best strategy for the supply of new housing (para 2.26). There is no compelling evidence to suggest that this strategy has previously been particularly successful; investment interest may well have been deterred in non-targeted areas to the detriment of the overall housing supply position. It is more important for the supply strategy to be rooted in broad sustainability, rather than narrow spatial, principles.</p> <p>- It is noted that brownfield sites in Newcastle are running out (Para 2.27) with adverse implications for housing supply. This suggests that suitably located greenfield sites will be required to meet future targets, particularly if the higher level projections are adopted. Such locations might embrace urban extensions and sites which are well located relative to established and emerging employment locations. Land in close proximity to Keele University offers real opportunity to provide attractive new housing in close proximity to high quality employment opportunities.</p>	<p>The preference for directing housing development to a broader range of locations, including greenfield development, rather than targeted regeneration is noted.</p> <p>The broad locations where future housing development may be located will begin to be explored at the Strategic Options consultation stage.</p>
IC013	Staffordshire Chambers of Commerce	The ability of the area to retain graduates to boost innovation and productivity in the workplace will rely on a ready supply of suitable accommodation for young people, including the option of high quality rental stock and affordable homes to purchase.	Support for the provision of high quality private rented properties and affordable homes to purchase in order to increase graduate retention is noted.
IC013/182	Staffordshire Chambers of Commerce	Viability is a potential impediment to the delivery of new housing. Too often, the requirement to demonstrate whether or not a development is viable arises at a relatively late stage in the planning process. The issue of viability needs to be addressed at the beginning of the process and the Local Plan should make this clear. (para. 2.22)	Recognition of viability issues is noted. Both councils will continue to assess the viability of future development through the preparation of the Joint Local Plan.
IC013/183	Staffordshire Chambers of Commerce	It is appropriate to review whether or not targeted regeneration remains the best strategy for the supply of new housing (para 2.26). Not only is there no compelling evidence to suggest that this strategy has previously been successful, but there is every likelihood that the 'closed door' policy has	The preference for directing housing development to a broader range of locations, including greenfield development, rather than targeted

		<p>resulted in investment being lost to Stoke-on-Trent and Newcastle, to the detriment of the overall housing supply position. The supply strategy should be rooted in broad sustainability, rather than narrow spatial, principles.</p> <p>If there is a shortage of brownfield sites in Newcastle (Para 2.27) and existing housing supply targets cannot be met, it would suggest that suitably located greenfield sites will be required to meet future targets. Such sites would need to be located near to established and emerging quality employment locations, public transport networks and other essential infrastructure provision.</p>	<p>regeneration is noted.</p> <p>The broad locations where future housing development may be located will begin to be explored at the Strategic Options consultation stage.</p>
IC013/186	Staffordshire Chambers of Commerce	<p>We are equally concerned that the policy imperative for residential might lead to existing sites allocated for employment purposes being re-allocated for residential uses. The ability to identify a five-year housing land supply needs to be balanced by a corresponding five-year employment land supply.</p>	<p>The Joint Local Plan will be required to demonstrate that there is sufficient deliverable land to accommodate the housing and economic needs identified, or that other measures are in place to meet the identified needs.</p>
IC016/203	Strategic Land Group	<p>Viability is central to the planning making process, with the Planning Practice Guidance confirming that it is a fundamental element of plan making to 'ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable'. The existing difficulties faced by both authorities in their attempts to deliver an adequate supply of housing are, in large part, a consequence of an over-dependence on brownfield sites where development is simply not viable. Viability should therefore be a key consideration from the outset in preparing the Joint Local Plan.</p>	<p>Recognition of the importance of viability issues is noted. Both councils will continue to assess the viability of future development throughout the preparation of the Joint Local Plan.</p>
IC017/208	Pochin Property	<p>The local housing market in the region needs to be strengthened in order to ensure this higher housing figure is delivered. We therefore strongly agree with the suggestion in the Issues Consultation document that a shift away from the adopted Core Strategy (2009) approach of targeting development predominantly in areas of urban regeneration is needed. Instead a more even distribution of development in other sustainable locations across the authorities will be essential to ensure there is a sufficient supply of deliverable sites to meet housing numbers. This approach will ensure the provision of a range of housing types in different locations, greatly improving choice in the local housing market, thereby helping to attract and retain a balanced and thriving population.</p>	<p>The preference for a broader strategy to deliver a range of housing types in different sustainable locations is noted.</p> <p>The broad locations where future housing development may be located will begin to be explored at the Strategic Options consultation stage.</p>
IC017/209	Pochin Property	<p>In the adopted Core Strategy (2009), Audley Parish is identified as a 'Rural Service Centre', one of the settlements that provide the most comprehensive range of essential rural services. Audley has a good range of key services including several shops (including a Co-op and Tesco Express), several</p>	<p>The broad locations where future housing development may be located will begin to be explored at the Strategic Options consultation stage.</p>

		<p>restaurants and pubs, a Library, a Theatre and a Community Centre. Two primary schools, Ravensmead County Primary School and Wood Lane Primary, are located in close proximity in the connected village of Bignall End. The Sir Thomas Boughy High School is located approximately 1 mile away. The village is well served by public transport with frequent bus services to Newcastle-under-Lyme and onwards to other destinations. The M6 and A500 are also in close proximity therefore providing easy access to Crewe and Stoke-on-Trent.</p> <p>Given its sustainability, and the need set out above to distribute additional growth outside of the urban centres, the Joint Local Plan should seek to allocate some housing growth in Audley over the plan period.</p>	
IC017/212	Pochin Property	<p>The site off Vernon Avenue in Audley is currently open land extending to approximately 1.6 hectares. The site is surrounded by existing development on all sides, with existing residential development on three sides, and the buildings of Wall Farm on the fourth. Given its enclosure, the site is effectively within the existing built extent of Audley and presents an ideal opportunity to accommodate growth without altering the natural boundaries or shape of the settlement. The enclosed location plan and illustrative site layout demonstrate the site is able to accommodate around 40 to 50 family homes for market sale and affordable tenure.</p> <p>The site is currently designated as Green Belt. However, due to the enclosed nature of the site, we do not consider it contributes towards the purposes of Green Belt as established by paragraph 80 of the National Planning Policy Framework ('the Framework'). The site is already almost entirely surrounded by the existing settlement and plays no role in preventing neighbouring towns from merging into one another. It benefits from a clear, defensible boundary in the form of the existing farm buildings and as such, its development would not contribute towards the unrestricted sprawl of the built-up areas or undue encroachment into the countryside. The site is some distance from the historic core of the village and therefore will not impact the setting and special character of local heritage assets. Whilst the site is greenfield, there are limited brownfield opportunities within Audley and so its redevelopment will not divert development away from alternative brownfield sites.</p> <p>Audley is a sustainable settlement and a suitable location to accommodate a proportion of the additional growth required in the Borough. Land at Vernon Avenue represents a suitable, achievable and deliverable housing site which is extremely well related to the existing shape of the settlement.</p> <p>The Joint Local Plan presents a vital opportunity to release sites such as land</p>	<p>Comments noted. The potential locations for future housing development and whether or not a review of Green Belt boundaries may be required will be considered at the Strategic Options stage. The Borough Council undertook a Call for Sites Exercise from September to October 2014 which is now closed. While the formal Call for Sites exercise has officially closed, there isn't a cut-off date for submitting sites; the Councils are continuing to accept site submissions after 31 October 2014. Although any any sites submitted after this date may be considered later in the Joint Local Plan preparation process.</p>

		<p>at Vernon Avenue from the Green Belt and thereby meet the housing needs of the region in a manner that promotes sustainable patterns of development. A comprehensive review of the Green Belt must be a fundamental part of the plan-making process.</p> <p>We trust the above is useful and our comments will be taken into consideration. We would be grateful to be kept informed of the next stages of the Joint Local Plan process</p>	
IC018/213	Willsgrove Developments	<p>Land at Spa Street, Cobridge: We have been promoting the site to the council including through the plan making and call for sites / SHLAA process for several years. There are no known constraints preventing the development of the site. The site is a former industrial site which is available for development for housing use within the next 5 years. The redevelopment of the site would raise the attractiveness of the local area, putting this visually unattractive site to use as much needed housing. The site benefits for pedestrian accessibility to the facilities in the local area including a choice of schools, health facilities and retail uses and excellent public transport linkages. The development of the site for housing purposes would also assist in the regeneration of the local urban area and would support local facilities. Within the context, the site is a previously developed site within a highly sustainable location in the main urban area of the borough. The local area benefits from retail, educational, employment and health facilities. The application proposal will assist the creation of a strong and sustainable community in the area. The site benefits from access to numerous local facilities, which it will greatly support. The development of the site for residential purposes would contribute to addressing the key challenges identified on pages 20 and 23 of the consultation document i.e. "To improve the areas economic competitiveness by attracting and retaining residents within Stoke-on-Trent and Newcastle under Lyme.</p>	<p>Comments Noted. The potential locations for future housing development will be considered further at the Strategic Options stage.</p>
IC022/237	Joan Walley	<p>Little thought has been given to housing tenure issues, changing demographics and need for extensive retrofit of existing stock.</p>	<p>Issue 5 explores issues surrounding affordable tenures (social rented and intermediate housing) and private rented tenures. Changing demographics is covered under Issues 1 and 2. Issue 4 explores the vacant housing stock but not explicitly retrofitting. The supporting Housing Technical Paper explores these issues in more detail and signposts the reader to other sources that provide relevant evidence and information.</p>



IC025/253	Barratt Developments PLC	<p>As part of the future examination of the Joint Local Plan, the council will need demonstrate that it can maintain a five year supply of housing land at all times through its housing trajectory, which should include a range of sites, including both allocations, sites with planning permission and sites under construction. At present, neither Stoke-on-Trent City Council or Newcastle-under-Lyme Borough Council are able to robustly demonstrate a deliverable 5 year housing land supply, either on the basis of the current Core Strategy housing requirement or the latest objective assessment of housing need. There is a national policy requirement to “boost significantly” the supply of housing. A range of sites therefore need to be identified across the two local authority areas to meet objectively assessed needs. Such needs should be met on a mix of sites, including previously developed sites, greenfield sites, and sites of a variety of sizes.</p> <p>It is clearly the case in the experience of Barratt Homes, that it is often the number of sites (“sales outlets”), rather than the size of sites that determines housing delivery rates over the plan period. In the experience of Barratt Homes, having a larger number of smaller sites, rather than a smaller number of large urban extensions leads to an increase in housing delivery as they are easier to deliver, and have less up front infrastructure requirements or other constraints that need to be overcome before housing can be delivered.</p>	Comments noted. The potential sites and locations for future housing development will be explored at the Strategic Options stage.
IC025/255	Barratt Developments PLC	It is therefore clear that in addition to improving the housing offer of the City to attract more business leaders and inward investment, as well as provide a mix of housing to attract and retain graduates and younger populations, there is also a need to identify, allocate and prepare a range of suitable and accessible sites to meet modern business requirements. Consideration should also be given to providing allocations and policies to support the provision of small business units to facilitate business start-ups in addition to the allocation of land to facilitate the growth and development of creative industries.	Comments noted. Issue 2 of the Economy section sets out the location of sites within the context of the area. A key challenge highlighted will therefore be to ensure the supply of land is located where it meets the needs of businesses and the labour force. This element will be explored further through the Strategic Options consultation and subsequent stages of the Joint Local Plan process.
IC024	Mr J Poole	The existing housing stock and supply across the City of Stoke-on-Trent almost entirely reflects an earlier pattern of economic structure and development. Much of the existing housing stock was built around and to support a manufacturing and industrial based economy. The shift away from this to a more skilled manufacturing, service and knowledge based economy means that the current housing supply does not wholly fulfil the local accommodation requirements.	The mismatch between the existing housing stock and the types of housing required to provide an appropriate workforce to support the economy are noted.

IC024/251	Mr J Poole	<p>It is acknowledged that any outward growth of the City would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN figure.</p> <p>It is considered that some areas around the City do not make a significant contribution to wider landscape character, or are not required to preserve the separation of the City from other smaller settlements.</p>	Comments noted. The potential locations for future housing development and whether or not this will require encroachment in to the countryside or a review of Green Belt boundaries will be considered at the Strategic Options stage.
IC025/256	Barratt Developments PLC	<p>It is acknowledged that any outward growth of Stoke-on-Trent and Newcastle-under-Lyme would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN figure.</p> <p>Prior to considering specific site allocations, the Council must ensure that it commissions a robust assessment of the Green Belt surrounding the urban areas in order to objectively determine the contribution that specific sites or areas make to Green Belt purposes.</p>	Comments noted. The potential locations for future housing development and whether or not this will require encroachment in to the countryside or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified
IC026/259	Messrs Barbara Isaac, Geoffrey Downes and Joan Talbot.	<p>An increase in the local housing requirement figure will require the two authorities to deliver housing on the edge of existing settlements, as well as seek to deliver housing through the redevelopment of previously developed land within the urban area, or other previously developed land in rural areas where appropriate. In the case of releasing land for development around existing settlements, it is considered that smaller settlements, such as Keele have a vital role to play in helping the Borough to meet its objectively assessed housing needs in the form of both infill developments and small extensions to the settlement. It is therefore considered that when the two authorities move forward with the next stages of Local Plan preparation that it undertakes a full Green Belt review, as well as consider extending existing infill boundary lines, village development boundaries, and consider “insetting” or defining infill boundary lines around other pockets of rural residential areas.</p>	Comments noted. The potential sites and locations for future housing development will be explored at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC026/260	Messer’s Barbara Isaac, Geoffrey Downes and Joan Talbot.	<p>It is concluded that the review of the housing requirement through the Joint Local Pan process necessitates a review of the Green Belt and existing settlement boundary/ infill boundary lines across the area to help meet objectively assessed housing needs. In addition to the allocation of larger sites, a package of measures to boost housing supply is required, and the release of smaller sites and a review of settlement boundary lines across the local authority area, including sites on the periphery of Keele are considered to be a key component of a wider suite of housing sites that could be quickly and</p>	Comments noted. The potential locations for future housing development and whether or not this will require encroachment in to the countryside or a review of Green Belt boundaries will be considered at the Strategic Options stage.

		easily delivered.	
IC030	Emery Planning	The current development plan strategy comprises the joint Core Strategy, adopted in October 2009. A key policy that runs throughout the Core Strategy relates to regeneration, and a key aspiration of the Plan is to provide the Core Strategy housing requirement through regeneration of brownfield land. Policy SP1 of the Core Strategy states that new housing will be primarily directed towards brownfield sites. The 2015 Annual Monitoring Report confirms that the Councils have been applying this policy, stating in Paragraph 4.9 that: "During the 2014/15 monitoring period, 96% of all new and converted dwellings were completed on previously developed land (647 out of 674). Whilst this is a reduction on the 2014 monitoring figures, the percentage of development on previously developed land is above 90% and is therefore still in keeping with Policy SP1 (Spatial Principles of Targeted Regeneration) to prioritise brownfield sites." It is clear from housing completion figures over the plan period that Policy SP1 has seriously suppressed housing delivery in the subject area. The following gross housing completions data is taken from the 2015 Annual Monitoring Report (Figure 1)	Comments relating to Annual Monitoring Report 2015 and related figures are all relevant to Stoke-on-Trent only. Policy SP1 applies to both local authority areas. The conclusion cannot be drawn from this evidence that Policy SP1 has suppressed housing delivery. However chapter 5 of the SHMA identifies that some planning proposals were refused on the grounds of the RENEW programme, and this does have some relevance to policy SP1 as it is a policy of targeted regeneration. The councils will be reviewing the continued relevance of existing planning policy as part of the preparation of the Joint Local Plan.
IC030/287	Emery Planning	The Options Paper in Paragraph 2.21 acknowledges the constraining impact of such policies in housing delivery terms, and acknowledges the unviable nature of many brownfield sites in paragraph 2.22. It goes on to state that: "This suggests that the authorities may need to consider whether the existing strategy of targeted regeneration of the urban areas is still the best strategy in light of our future housing needs." It is agreed that a revised approach to housing development is required. As indicated above, the previous approach to housing delivery has been to target specific regeneration areas. This has largely failed due to low market interest and viability issues. As a consequence, the number of dwellings delivered has fallen well below need. There is therefore a significant backlog of housing which will need to be delivered alongside future need. A housing requirement for Stoke-on-Trent and Newcastle-under-Lyme going forward is therefore likely to be much higher than the Core Strategy figure and potentially the figures currently stated in the Issues Paper. Given the failure of past approaches to delivering housing need, it is considered that an alternative approach to housing delivery should be adopted in the emerging Joint Local Plan. Given the likely high housing requirement, the low market interest in previously developed sites and viability issues, it is	Support for moving away from policy approaches that target regeneration to the urban areas is noted.  The potential locations for future housing development and whether or not this will require greenfield development or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.

		<p>considered essential that such an approach incorporates the use of sustainable greenfield sites and the use of land currently located with the Green Belt if housing need is to be met.</p> <p>A Green Belt review to identify potential sites for removal from the Green Belt that do not perform the purposes of the Green Belt, as identified in the National Planning Policy Framework (the Framework) is therefore considered to be required. It is therefore essential that the emerging Local Plan contains a policy that will allow for a review of Green Belt boundaries, and such a review is undertaken as part of the preparation of the Joint Local Plan. We therefore request that a housing delivery strategy in the emerging Joint Local Plan includes the use of greenfield sites on the edge of the existing built-up area, including the release of sites currently in the Green Belt. It is considered that this is essential if future housing requirements are to be met, as the current strategy of using previously developed land and land within regeneration areas in particular has failed.</p>	
ICo30/286	Emergy Planning	It is clear from housing completion figures over the plan period that policy SP1 has seriously suppressed housing delivery in the subject area.	Chapter 5 of the SHMA identifies that some planning proposals were refused on the grounds of the RENEW programme, and this does have some relevance to policy SP1 as it is a policy of targeted regeneration. The councils will be reviewing the continued relevance of existing planning policy as part of the preparation of the Joint Local Plan.
ICo31/290	Renew Land Developments	Prior to the publication of the National Planning Policy Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is acknowledged at paragraph 2.21 of the Issues Consultation Document. It is the opinion of Knights therefore that the higher level of housing need is more appropriate.	Support for moving away from policy approaches that target regeneration to the urban areas is noted.
ICo31/292	Renew Land Developments	Housing policies in the emerging Local Plan must be sufficiently flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green Belt.	<p>The preference for directing housing development to a broader range of locations, including both brownfield and greenfield development, is noted.</p> <p>The potential locations for future housing</p>

			development and whether or not this will require changes to settlement boundaries or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC033	Severn Trent Water	It is acknowledged that the authorities are unable to determine whether there is sufficient housing land to accommodate this level of growth until a Strategic Housing Land Availability Assessment (SHLAA) is completed. However, the historic under-delivery of housing reported in the Housing Technical Paper is suggested that current supply is not meeting requirements. Therefore, it is considered that an alternative strategy to housing delivery should be pursued that may involve the release of Green Belt land which has artificially constrained growth and pushed development to areas of open countryside beyond the Green Belt	Comments noted. The potential sites and locations for future housing development will be explored at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC033/306	Severn Trent Water	The authorities will need to have due regard to the Housing and Planning Bill, the NPPF (including any potential revisions) and PPG among other guidance in preparing housing policies in the Joint Local Plan.	Comment noted. The Joint Local Plan is required to be in conformity with the requirements of all of these.
IC033/307	Severn Trent Water	<p>The issue of outmigration and population decline is closely linked to housing need and the ability of the authorities to provide housing in the areas residents want to live. A key challenge is retaining higher earners as there are a lack of high quality executive housing available, as identified in the Housing Technical Paper which states:</p> <p>“There are fewer large high-value properties when compared to neighbouring authorities and a comparatively limited number of income earners within both authorities. This lack of housing choice may therefore cause households to move out of the area to access greater choice and creates a relatively low representation of households with higher income earners.”</p> <p>In order to increase housing choice, particularly at the executive end of the spectrum, the joint authorities through the Local Plan process should look to review Green Belt boundaries in order identify sustainably located sites within the administrative boundary which could cater for this market.</p> <p>STW broadly agree with the challenges identified by the authorities.</p>	Comments and support noted. The potential sites and locations for future housing development will be explored at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.

ICO34/313	Historic England	Para 2.22 – Historic England is aware of the issues relating to project viability and heritage assets would recommend that at the options stage the historic environment is considered in respect of any CIL Regulation 123 list which may be established by both Local Authorities (whether jointly or separately) and also in respect of CIL discretionary relief.	Comment noted and but no decisions have yet been made to progress with CIL
ICO35/324	Mr Hussain (Knights)	Prior to the publication of the National Planning Policy Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is acknowledged at paragraph 2.21 of the Issues and Options Consultation paper. It is the opinion of Knights therefore that the higher level of housing need is more appropriate to address a previously suppressed housing market.	Support for moving away from policy approaches that target regeneration to the urban areas is noted
ICO35/326	Mr Hussain (Knights)	Housing policies in the emerging Local Plan must be sufficiently flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green Belt.	<p>The preference for directing housing development to a broader range of locations, including both brownfield and greenfield development, is noted.</p> <p>The potential locations for future housing development and whether or not this will require changes to settlement boundaries or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.</p>
ICO36/330	Renew Land Developments	Prior to the publication of the National Planning Policy Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is acknowledged at paragraph 2.21 of the Issues Consultation Document. It is the opinion of Knights therefore that the higher level of housing need is more appropriate.	Support for moving away from policy approaches that target regeneration to the urban areas is noted.
ICO36/331	Renew Land Developments	Housing policies in the emerging Local Plan must be sufficiently flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green	The preference for directing housing development to a broader range of locations, including both brownfield and greenfield development, is noted.

		Belt	The potential locations for future housing development and whether or not this will require changes to settlement boundaries or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC037/335	Mr C Taylor and Mr S Taylor	Prior to publication of the Framework the Housing Market Renewal Pathfinder Initiative effectively operated a policy of restraint on delivering housing across the proposed plan area, only allowing residential development on sites within the targeted regeneration areas. It is considered that this approach may have exacerbated housing need further. This point is acknowledged at paragraph 2.21 of the Issues Consultation Document. It is the opinion of Knights therefore that the higher level of housing need is more appropriate. 2.9 A higher housing requirement is likely to necessitate a review of Green Belt boundaries and other settlement boundaries adjacent to countryside that is not designated as Green Belt, and this matter is addressed later in this representation.	Support for moving away from policy approaches that target regeneration to the urban areas is noted.  The potential locations for future housing development and whether or not this will require changes to settlement boundaries or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC037/336	Mr C Taylor and Mr S Taylor	Housing policies in the emerging Local Plan must be sufficiently flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green Belt.	The preference for directing housing development to a broader range of locations, including both brownfield and greenfield development, is noted.  The potential locations for future housing development and whether or not this will require changes to settlement boundaries or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC038/341	TFK Property Limited	Housing policies in the emerging Local Plan must be sufficiently flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green	The preference for directing housing development to a broader range of locations, including both brownfield and greenfield development, is noted.

		Belt.	The potential locations for future housing development and whether or not this will require changes to settlement boundaries or a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.
IC040	Gordon Lancaster - Madeley Conservation Group	Once a robust 5 year housing land supply is available, effect a newer moratorium" on Green Belt and greenfield development until the new plan is finalised and approved.	These comments relate to interim approaches that could be taken outside of the Joint Local Plan process. It is therefore not appropriate to respond to this comment here, however officers will consider the issues raised in a wider context.
IC044/366	John Wright Blue Planet Communications	The old Keele golf course is perfect for housing development. It has a pleasing, rural aspect and would be popular with house-buyers. It is large enough to accommodate a mix of development so starter homes and larger properties could comfortably sit side-by-side on this large site.	Comments relating to this site are noted however whether or not individual sites are appropriate to take forward for allocation will not begin to be explored until draft plan stage.
IC047/374	Atherton Family	The administrative area of Newcastle under Lyme is very constricted by the existing green belt policy. This severely limits the choice of appropriate sites for high quality housing and affordable housing for families living and working within the rural area. The JLP, now proposed with Stoke-on-Trent City Council, does little to improve this situation as much of available land within the joint administrative area is suitable only for low grade housing. It is often undeliverable due to contamination issues or lack of market interest.	Comments relating to the availability and deliverability of land for housing are noted.  The potential sites and locations for future housing development will be explored at the Strategic Options stage.
IC050/391	SOTCC Regeneration and Development Team	To move to this position, rather than a focus on 'managing need' or "responding to need", the Local Plan needs a primary focus on the issue of creating very significantly higher levels of demand for higher quality higher value houses and a range of employment uses that can drive values to a position where developments are both deliverable and can contribute to the additional city and social infrastructure needed to service them. To do this it needs to be framed in such a way that it can create a viable market and attract and/or retain a new and wider customer base to the city.	Comments noted regarding the exiting policy context. The Strategic Options consultation will begin to explore potential strategies, including the location and level of growth.



IC050/392	SOTCC Regeneration and Development Team	It is increasingly clear that the city cannot reverse its economic path by simply continuing its historical approach to growth and city regeneration – focusing on a gap funding model to tackle the complex, expensive, unviable brownfield sites around the urban core. Instead the city needs to focus on market-making – to recast itself for a new audience - if it is to radically improve the outlook for existing residents, communities and the city and town centres.	Comments noted regarding the exiting policy context. The Strategic Options consultation will begin to explore potential strategies, including the location and level of growth.
IC050/395	SOTCC Regeneration and Development Team	It is clear that attempting to use the planning system to constrain growth to try and force it into the city (and specifically the urban core) has had limited impact and has certainly not delivered the structural change needed in the Stoke-on-Trent development market.	Comments noted regarding the existing policy context. The Strategic Options consultation will begin to explore potential strategies including the level and location of growth in order to address some of the issues identified.
IC050/393	SOTCC Regeneration and Development Team	The city needs to think about growth differently. To do so it has to focus on market-making- creating the conditions that attract consumers and using small amounts of highly targeted public investment so that developers and investors will respond to that demand.	Comments noted regarding the existing policy context. The Issues consultation identifies the challenge to strengthen the local housing market. The potential locations and level of growth will be explored further through Strategic Options.
IC050/396	SOTCC Regeneration and Development Team	A new approach to growth in Stoke-on-Trent is needed that brings a rapid increase in high quality homes and employment locations in the city, bringing with it a footfall and spend that can contribute to sustainable town centres.	Comments noted regarding the existing policy context.
IC052/411	NFU	We have not made a detailed examination of all the locations outlined as site allocations for employment or housing development. However, where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses	The Issues Consultation Document does not explore potential sites or locations for housing and employment development. This will begin to be explored at a broad level at the Strategic Options consultation stage and the draft and final versions of the plan will include more detailed site allocations. Your comments made about noise and odour arising from farm and livestock units will be considered as part of this process.
IC061/441	CJ Harrison	The evidence on uncompleted housing permissions suggest that developers do not see those developments as economically viable. The JLP suggests the answer is to build on green field sites. How does this rejuvenate the run-down urban centres?	The Issues Consultation Document does not suggest that the answer to viability is to build on greenfield sites. It does raise the issue that perhaps a different strategy

			from targeted regeneration may need to be pursued, but it does also highlight the danger of the urban areas being 'hollowed out' if investment does not take place in areas of deprivation. No preferred solutions have been identified at this stage. The Strategic Options stage will begin to explore how the issues affecting the area could be addressed.
IC063/469	Judith Oppenheimer	It is essential for NuL to develop Local Plan policies that (1) specifically protect the rural area from inappropriate development and (2) focus on the natural environment, biodiversity and supporting a healthy rural economy. Housing and employment development in the rural area should focus on sustaining the rural population and economy, not on expansion.	Future housing development in the rural area will have to respond to identified needs, to be in accordance with national planning policy. Housing and employment development will need to be in balance in order to be sustainable. The other comments relate to the Natural and Rural Environment topic.
IC067/497	Christopher Preece	<p>H.M.O.  The city has a large number of areas which have older large properties built pre-war which make very good Houses of multiple occupancy.  As time moves on more and more houses are being converted. Currently the regulations are not detailed enough, i.e. in some cases do not need planning approval.  This can lead to.</p> <ol style="list-style-type: none"> <li>1) Overcrowding in some areas.</li> <li>2) Parking problems.</li> <li>3) Disturbance to Neighbours.</li> </ol> <p>All H.M.O property should need planning approval i.e. subject to article 4 and surrounding area suitability taken into account.  A full inventory of detailed requirements is required for properties to suit the number of occupants. These houses are a useful facility, but must not downgrade the neighbourhood. The ratio to standard houses must be limited.  Should also people of same family be included in this. Some families may have several generations occupying one property.  REF 262 Princes road Penkhull 59305/ful. Brampton area Newcastle under Lyme.</p>	Comments noted. The councils will consider whether or not a policy encouraging Article 4 directions to be applied in certain areas is an appropriate solution to include in the Joint Local Plan. This is most likely to be explored from the draft plan stage onwards.

IC068/504	Gary Deane	<p>Support the Councils findings that: Large numbers of people continue to move out of Stoke, many of which are graduates that have potential to be high earners, fill quality jobs and support business investment.</p> <p>A weak housing market has reduced the number of houses that have been built across the two areas. The viability of development sites continues to be a significant challenge.</p> <p>Targeted regeneration has provided a steady supply of housing although not enough to stem the tide of out migration.</p> <p>Many local residents commute outside the area to work.</p> <p>If past trends continue, current planning policies will not deliver enough new housing on sites that are both attractive to developers and future occupiers.</p>	Supporting comments noted
IC071/519	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>We are concerned by 'development pressures' in the Rural Areas, in and beyond the Green Belt as, whilst some areas have highly attractive environments, the property market is still a cheap one overall compared with most of Britain and there are considerable shortfalls in community facilities and sustainable public transport. As an example of this the current Loggerheads public transport provision does not allow travel to/from employment areas at times compatible with working hours and, with up to 500 houses having been built here in the recent past, there have been no improvements to public transport, community facilities and the matters previously set out in detail in the Loggerheads Neighbourhood Statement. The then Leader of the Borough Council confirmed, in writing that that document reflected the views of the Residents of the Parish of Loggerheads.</p>	<p>The location of new housing and the infrastructure required to support it will be explored at the Strategic Options stage. Comments made by the former Leader of the Borough Council in regard to the Loggerheads Neighbourhood Statement should be considered in the context that they were made at the time and not as part of this Issues consultation.</p>
IC071/521	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>One of your key challenges is oversimplified. You are already approving schemes for unsustainable development outside the urban area and remote from employment opportunities. It is essential that the provision of sufficient local facilities to support growth in housing provision is brought up to date where development has been allowed, in some cases, to overwhelm existing facilities and is greatly improved in parallel with any future development. The two authorities must find ways to utilise the extensive area of brownfield land both in Newcastle under Lyme and Stoke-on-Trent before there are any further unsustainable incursions into the rural areas that do not have the community and transport facilities.</p>	<p>The Core Spatial Strategy currently aims to locate most residential development in the rural areas to brownfield sites within the village envelopes of these three settlements. This strategy has been undermined since the publication of the NPPF, as this is a policy which relates to the supply of housing and paragraph 49 of the NPPF states that "Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites". The Borough Council has not been able to demonstrate a five year supply of housing</p>

			<p>land since 2010. This has led to housing development proposals being submitted and approved outside the designated village envelope boundaries in Newcastle's rural area. Therefore the extent of the current village boundaries will be reviewed within the Joint Local Plan.</p> <p>Further evidence will be collected to understand community resources and facilities across the JLP areas as part of the infrastructure work which will support the JLP process. Loggerheads Parish is working on a Neighbourhood Plan (NP) which could include this type of development need within the NP area.</p> <p>The Strategic Options stage will begin to explore how the identified need could be accommodated in both areas.</p>
IC072/547	Dean Lewis (Tim Dean)	<p>If the City and Borough are to succeed under their duty to cooperate to deliver the necessary housing and economic prosperity that the area needs, then extent of Green Belt must be reviewed. As presently drawn, it stymies any realistic prospect of the full objectively assessed needs of the conurbation being met. The consequence of such failure would result in economic deprivation, poor social living conditions and a missed opportunity to bring about genuine net gains in all three dimensions of sustainable development. Both the City and Borough must recognise that whilst brownfield regeneration has a major role to play in bringing about economic prosperity, both Council's must also fully recognise that in the absence of a strategic review of green belt boundaries, the growth ambitions cannot be met with brownfield regeneration alone. The consequence of not reviewing the Green belt would result in serious social and economic harm to the area.</p>	<p>Comments noted. The potential locations for future housing development and whether or not this will require a review of Green Belt boundaries will be considered at the Strategic Options stage. It will not possible to progress with a review of Green Belt boundaries until a specific need for it has been identified.</p>
IC072/554	Dean Lewis (Tim Dean)	<p>Housing growth in the HMA will be a critical part of the proposed rebalancing of the economy and vital for retaining the younger working age population in the HMA.</p>	<p>Support for housing growth and rebalancing the economy noted.</p>

IC072/561	Dean Lewis (Tim Dean)	The existing Core Spatial Strategy policy approach of locating most residential development in the rural on brownfield sites is essentially defunct. Insufficient brownfield land exists within these settlements to accommodate the level of need required to allow these centres to grow sustainably	Comment noted. The Strategic Options consultation stage will explore the capacity for housing development of different broad locations across the plan area. It will be from this stage onwards when judgements will be made as to whether or not policy adjustments may be required in order to meet the identified housing needs.
IC072/566	Dean Lewis (Tim Dean)	<p>Dean Lewis Estates notes that I&amp;O does not directly deal with the fundamental matter deliverability of the plan.</p> <p>In our view, a disproportionately high reliance on urban brownfield development will result in significant under delivery of the plan.</p> <p>Deliverability of previously developed sites should be thoroughly tested, not only in terms of viability, but in terms of compatibility of use. The longer gestation period for such sites to legitimately be in a position of deliverability should also be factored into the timescales for successful implementation of the plan.</p> <p>The Local Plan must acknowledge that PDL is not sufficiently available or deliverable to enable successful delivery of all of the needs of plan up to 2033. A portfolio of different types of sites, spread across Stoke-on-Trent and Newcastle-Under-Lyme will be necessary to provide the greatest chance of success of Council meeting its development needs sustainably.</p> <p>Funding procured from developments should be structured so as to aid cash flow of developers in order to significantly boost delivery rates. This approach provides a realistic and more robust strategy for successful and timely delivery of essential infrastructure. Requiring weighty upfront payments or payments too early on in the development of sites will impede growth. A policy in respect of infrastructure should enshrine this concept to ensure successful delivery.</p>	<p>The deliverability of potential housing sites (covering viability, suitability and all other related matters) will be assessed as part of each authority's SHLAA work. This work will inform the development of Strategic Options which is the next stage in the plan preparation process.</p> <p>The latter comments are relevant to CIL and any potential infrastructure policy. Policies such as this will be explored in more detail from draft plan stage onwards and the types of issues raised by the comment will be considered under any supporting CIL work for the Joint Local Plan.</p>
IC074/569	Craig Ball (Heaton planning)	We are making representations on behalf of Tarmac Ltd who are the landowners of the Walleys landfill site situated between Silverdale and Thistleberry .We would ask that careful consideration is given to potential future development in the area surrounding the Walleys landfill site to ensure appropriate safeguarding of existing uses present within the area. It is appropriate for a suitable stand-off to be provided for existing development from potentially sensitive receptors.	Comment noted – the Council sought to resist residential development near the site and refused planning permission for 138 dwellings on Hampton’s Scrapyrd and adjacent field at Keele Road, Newcastle-under-Lyme. The subsequent appeal was allowed on 14 September 2016.It is highly unlikely that the Council could sustain a refusal on similar grounds near this or other similar sites in the future.

			This issue is already being considered within the SHLAA work and will also be considered as work on the Joint Local Plan progresses.
IC075/573	Steven Matthews	Use brownfield sites for new housing and maybe new businesses.	Support for the use of brownfield land is noted.
IC077/584	Andy Perkin (Potteries Heritage Society)	The document is very thorough in identifying issues regarding needs, demands and dressing the specific requirements of types of residents, but falls short of identifying design issues and the challenges surrounding them. Although 2.34 identifies the key message "the private rented sector is...not always providing housing of appropriate quality", we would suggest that this is true of all sectors and this should be followed with a key challenge for the plan. Evidence (perhaps from other authorities) should be gathered that demonstrates that better designed homes may attract people to live and invest in the area, strengthening the local market. This would also apply to environmental design standards which are no longer called for in national policy.	The comments regarding design quality of all types of housing and improving living environments is noted. Design is a more detailed matter that may be more appropriately addressed from draft plan stage onwards. In regard to the quality of the private rented sector, this was highlighted in the SHMA as a particularly significant issue affecting the plan area.
IC077/585	Andy Perkin (Potteries Heritage Society)	More could also be included on housing density, considering locations, such as the main centres, where high density would be appropriate and have environmental benefits by reducing transport needs. We would also like to see opportunities for live-work spaces being developed and an exploration of shared facilities in schemes such as co-housing.	Density of new housing will be explored at a broad, strategic level at Strategic Options and will draw from evidence contained in the new SHLAAs. More detail on density and the other types of housing referred to in the comment (live/work and co-housing) will set out at the draft plan stage.
IC077/586	Andy Perkin (Potteries Heritage Society)	Overall there may be an over-reliance on a concept of house ownership, rather than other forms of tenancy, which may be outdated when an up-and-coming generation either cannot afford or may choose not to own houses. We believe the area needs a mix of national, regional and local developers to tackle a variety of sites. This section does not mention self-build as a potential solution (in part, at least) to affordability.	Preference for less reliance on home ownership is noted. The Joint Local Plan cannot specify the types of developers who take on the development of housing sites although it may be appropriate to allocate a range of housing sites in the Joint Local Plan. Both councils will give further consideration to self-build developments as required under the Housing and Planning Act 2016. This will be most appropriately addressed at the draft plan

			stage.
IC079/600	Andy Perkin (on behalf of) Stoke Neighbourhood Forum	The document is very thorough in identifying issues regarding needs, demands and dressing the specific requirements of types of residents, but falls short of identifying design issues and the challenges surrounding them. Although 2.34 identifies the key message "the private rented sector is...not always providing housing of appropriate quality", we would suggest that this is true of all sectors and this should be followed with a key challenge for the plan. Evidence (perhaps from other authorities) should be gathered that demonstrates that better designed homes may attract people to live and invest in the area, strengthening the local market. This would also apply to environmental design standards which are no longer called for in national policy.	The comments regarding design quality of all types of housing and improving living environments is noted. Design is a more detailed matter that may be more appropriately addressed from draft plan stage onwards. In regard to the quality of the private rented sector, this was highlighted in the SHMA as a particularly significant issue affecting the plan area.
IC079/601	Andy Perkin (on behalf of) Stoke Neighbourhood Forum)	More could also be included on housing density, considering locations, including the Stoke NP area, where high density would be appropriate and have environmental benefits by reducing transport needs. We would also like to see opportunities for live-work spaces being developed and an exploration of shared facilities in schemes such as co-housing.	Density of new housing will be explored at a broad, strategic level at Strategic Options and will draw from evidence contained in the new SHLAAs. More detail on density and the other types of housing referred to in the comment (live/work and co-housing) will set out at the draft plan stage.

#### Issue 4 - Vacant Housing Stock

Reference	Consultee	Comments	Officer Comments
IC062/450	Marshall Fear	What approach is to be adopted to tackle the high percentage of existing properties which remain "Unfit"? And the fact that we still have a large amount of poor quality terraced type housing?	The quality of the existing housing stock is an important matter for the Joint Local Plan to address. Further work on this will be required such as discussion with both councils housing teams. This issue can be explored in greater detail at the draft plan stage.
IC071/530	Karen Watkins (Loggerhea	Empty properties in both Council areas are a problem which is apparently being ignored. The last time we checked there were over 1800 empty properties in the Newcastle under Lyme area alone, many of them with convenient local facilities,	Support for bringing empty properties back in to use is noted, however this issue is not being ignored as the comment

	ds Parish Council & Neighbourhood Plan Working Group)	including existing sustainable public transport links. It is essential that these properties are brought back into use. We indicated earlier that the Councils might consider using financial reserves to bring brown field land to the market in a developable condition. The same comment applies to the re-use of empty properties. Why do the Councils not renovate these properties to a standard which could make them attractive purchases or rentals within the low value market already identified? In Newcastle under Lyme the proceeds from the sale of Council owned development sites, currently available, could also be used for this purpose	suggests - Issue 4 of the Issues Consultation Document identifies this as a key challenge for the Joint Local Plan to address. It is unclear what the source is for the 1,800 vacant dwellings figure identified in the comment. The SHMA presents recent data from council tax records in August 2014 which show that there were 1,401 vacant properties in the borough. It also suggests that the current 3% vacancy rate identified in the 2011 Census is an appropriate level to continue to apply in the future as it reflects the 'functional operation of the housing market'. Most empty properties are not in either council's ownership and so neither authority can renovate properties themselves. Instead both councils are largely reliant on the owners of empty properties to bring them back in to use. A policy approach could however be applied to encourage or enforce owners of these properties to bring them back in to use. It is most appropriate to explore this at the draft plan stage.
IC075/570	Steven Matthews	Use empty buildings for homeless & immigrants.	The Joint Local Plan will not be able to prescribe which social groups should occupy empty buildings but both councils acknowledge the need to bring empty properties back in to use, as highlighted under Issue 4
IC076/575	W Naylor	Empty homes grant could be made more attractive e.g. by a pro-rata repayment arrangement.	Empty homes grants are administered outside of the planning system. However officers acknowledge the need to work closely with empty homes officers to determine how empty homes could be brought back in to use.



## Issue 5 : Affordable Housing

Reference	Consultee	Comments	Officer Comments
IC004	University Hospitals of North Midlands NHS Trust	The Trust also supports the provision of affordable housing as part of new developments, providing that the viability of schemes is considered fully.	Support for affordable housing within viable private market schemes is noted.
IC005/23	St Modwen	Paragraph 2.32 acknowledges the importance of development viability within affordable housing. This is echoed in the key message identifying that “affordable housing should be provided on new schemes but the profitability of sites and suitability of housing proposed means this is not always possible.” RPS strongly agrees with this assertion. Given the significant remedial costs that can often be associated with brownfield redevelopment and the relatively low housing market prices, flexibility over the provision of affordable housing is essential. Further, given the changing environment of Registered Social Landlords and Housing Associations, it is imperative that sufficient flexibility is included within policy wording to allow for change should the Government change its agenda on how affordable housing will be delivered, as appears to be the case in the Housing and Planning Bill currently being read in the House of Lords	Supporting comments noted. In regard to the flexible approach in the Joint Local Plan's policies, this will be explored in detail at the draft plan stage.
IC011/138	Thistleberry Residents Association	Similarly affordable housing is equally problematic. For how long is a house on the open market affordable? We note with concern that Council houses, now purchased, are either up for rent or being sold on at market prices and are being advertised by estate agents as ‘good buys’. Is this legal? LAs and Housing Associations need to retain a housing stock expressly for ‘the needy’. Social housing should not be a lifetime asset. This stock should not be sold off or, if it is, it should be as part of a cooperative and returned to the cooperative for resale when occupants are ready to afford the open market. Getting on the housing ladder is not an end in itself and is of no real benefit if occupants cannot afford to live in or upkeep the properties etc. These issues should be balanced in order to make adequate provision for all. Similarly buy to let schemes are equally counterproductive in that often houses are bought up and left empty when owners are disillusioned by the rental processes. Shared ownership schemes appear to be a preferred option as affordable housing. Starter homes (alias student	<p>The ownership of social rented and purchased properties is not a matter for the Joint Local Plan to address. However it will be required to help deliver the requirements of the new Housing and Planning Act, which amongst other measures encourages the provision of new starter homes.</p> <p>In regard to intermediate housing, this is defined in the glossary however the councils will consider whether or not it is appropriate to also include a definition within the text of the document itself.</p>

		accommodation) could create a plethora of slum dwellings in the future unless careful plans are in place for internal and external building maintenance. It is also an open door for speculative purchasing of housing stock. We need to know what 'intermediate housing' is!	
IC014/191	HARP	<p>We are concerned that assumptions made within the SHMA methodology and the Issues consultation document, significantly downplay the affordable housing need within the region.</p> <p>Issue 5: Affordable Housing sets out a number of 'key messages' which include:</p> <ul style="list-style-type: none"> <li>• "Affordable housing should be provided on new schemes but the profitability of sites and suitability of housing proposed means that this is not always possible."</li> <li>and</li> <li>• "The private rented sector is meeting some of the needs for affordable housing but not always providing housing of an appropriate quality."</li> </ul> <p>We applaud the Council's recognition that affordable housing is important when considering new housing schemes but are concerned that the negative wording of the key messages are pre-empting the reduction of affordable housing on future schemes by suggesting that its provision can make schemes unviable.</p> <p>We are also concerned by the reference within the SHMA and the key messages to the part that the private rented sector can play in satisfying the need for affordable housing in the region.</p> <p>In the examination of the Eastleigh Local Plan, the Inspector found the Plan not to be sound, in large part due to the Council's failure to recognise the true scale of need for affordable housing. In his report, the Inspector stated that "there is no justification in the Framework or Guidance for reducing the identified need for affordable housing by the assumed continued role of the private rented sector with local housing allowance. This category of housing does not come within the definition of affordable housing in the Framework". This was confirmed in the High Court judgement concerning Oadby and Wigston Borough Council v CLG and Bloor Homes Ltd. (2015).</p> <p>We therefore consider that the Council should re-consider the methodology for calculating the affordable housing need within the region in order to recognise its true scale. Policies in the Local Plan should then be created positively and with the true affordable housing need in mind in order to ensure that the provision of affordable housing is maximised over the Plan period.</p>	Both councils consider that the methodology employed within the SHMA does identify the most accurate level possible of affordable housing need. The SHMA also states that the councils will need to meet their overall objectively assessed housing needs in order to also meet their affordable housing needs. This is also reflected in the following key challenge for Issue 5; "Meeting the evidence of need for affordable housing across both local authorities". No decisions have yet been made about how the affordable housing need can be met. This will be explored further at Strategic Options. Both councils will also continue to keep all evidence under review, including the SHMA, to ensure that it remains up to date.
IC027/262	Keele Parish Council	We are also concerned about the lack of affordable housing in many new developments, particularly in the rural areas of the borough. The failure to build affordable homes on new-build in green field sites means local youngsters can't buy homes in the villages they were raised in, and this distorts the demographics	Comments noted. The councils will consider how affordable housing can be delivered in rural areas at the Strategic Options stage

		of villages.	
IC027/262	Keele Parish Council	Housing and employment development in the rural area should focus on sustaining the rural population and economy, and as previously stated needs to include affordable housing for younger families and not solely consist of executive housing to maximise profit.	Support for affordable housing in the rural area is noted.
IC058/428	Steve English	All affordable housing should be located on urban sites where residents will benefit from communal facilities and transport.	Preference for affordable housing to be located in urban areas is noted, however the SHMA has identified that there are affordable housing needs arising from the rural areas themselves. The potential to accommodate affordable housing developments across the plan area will be explored at Strategic Options.
IC068/505	Gary Deane	Support the Councils findings that: Affordable housing should be provided on new schemes but the profitability of sites and suitability of housing proposed means that this is not always possible.	Supporting comment noted.
IC070/513	Janet Simpson (Madeley Parish Council)	The section on housing and the problems of affordable accommodation in Rural areas is covered. However, there is also a need to stress the importance of design and quality of new build.	Supporting comment noted. In regard to design and quality, these are more detailed matters that may be more appropriately addressed from draft plan stage onwards.
IC076/576	W Naylor	A joint approach to licensing all rented houses could be a way of improving quality/ with financial penalties for unlicensed landlords.	It is outside the remit of the Joint Local Plan to license private rented properties.

### Issue 6 : Specialist Housing Need

Reference	Consultee	Comments	Officer Comments
IC001/1	SOTCC Building Control	I can't see anything in there that refers to addressing the housing shortage for people with disabilities. I know there is a local problem particularly with younger people with disabilities from anecdotal evidence. I am aware of one woman in her early fifties who has just spent 9 months (and is still waiting) in a retirement	The need for specialist accommodation is considered in the SHMA. This evidence document will inform the JLP of the needs of the Housing Market Area to provide a

		home waiting for suitable accommodation for wheelchair user. This is because the available accommodation which would have been suitable for her needs has been designated for older people 55 plus she is too young. The local plan needs to address the shortage of specialist housing for younger people (under 60) with disabilities and also needs to ensure that flexible housing is built to Lifetime Homes standard to better meet future housing needs of our communities.	range accommodation types to meet different people's needs.
IC004/16	University Hospitals of North Midlands NHS Trust	The provision of a wider choice of housing to accommodate the executive and higher value housing market needs to be reflected in the Joint Local Plan. Many of the Hospital's Workforce choose to live outside of Stoke-on-Trent due to the inadequate supply of Executive Housing, therefore expanding the choice of housing available in the Joint Local Plan area will allow our staff more housing options.	Support for a wider choice of executive and higher value housing is noted.
IC005/24	St Modwen	The requirement for specialist need housing, specifically high value housing is encouraged and reflective to the requirement to attract and retain high value employment and housing. Further consideration of the provision of residential institution/extra-care facilities has been included in the technical note at Appendix 2.	Support for specialist housing, specifically high value housing is noted. Comments in the appendix relating to C2 accommodation will be considered as part of the review and refinement of the objectively assessed housing needs.
IC007/37	Willsgrove Developments	We welcome the statement in paragraph 2.37 of the consultation document that a shortage of higher value housing stock may have impeded peoples' ability to move up the housing ladder on the Housing Market Area. We also welcome the reference to the recommendation in the Strategic Housing market Availability Assessment that following the completion of the Employment Land Review the councils should update the Executive Housing Market Study (2010). It is our view that a greater supply of higher value / executive housing is required in order to attract and retain a more skilled workforce in the local economy and also to reduce the propensity of such staff to commute to Stoke and Newcastle from surrounding areas such as Cheshire and Staffordshire Moorlands.	Support for more provision of higher value housing and to undertake more evidence gathering in support of this is noted
IC007/38	Willsgrove Developments	We have been promoting the site to the council including through the plan making and SHLAA processes for several years. Whilst the site is located in the Green Belt, it is previously developed and is particularly suited to the provision of a high quality "executive homes" scheme.  The site is capable of offering the following package of benefits to the local area:	Comments noted. The potential sites and locations for future housing development and whether or not this will require a review of the Green Belt boundaries will be considered at the Strategic Options stage.

		<ul style="list-style-type: none"> <li>• The provision of executive housing on a site which is available, suitable and deliverable immediately. Additional executive housing in the Stoke area would assist in delivering economic growth in the area.</li> <li>• A more attractive and defined boundary to the urban area.</li> <li>• An improved area of open space for the use of local residents.</li> <li>• Highways improvements / improved footpath linkages in the area.</li> </ul> <p>It is our view that the improvement of the housing stock in Stoke by the provision of more executive homes is regarded as being vital to the future economic regeneration of the area.</p> <p>The provision of such housing is important to the economic regeneration of North Staffordshire and that new executive housing should be suitably located in areas away from the urban core, such as Packmoor. This point is supported by the adopted Core Spatial Strategy. The need for some lower density, high quality new development is accepted.</p> <p>The site provides the opportunity to broaden the housing mix in the Stoke area. We believe that the site is a prime location for higher quality, “executive” housing, of which we understand there is a shortage in Stoke by virtue of its semi-rural location, its accessibility to the surrounding area and the Bloor housing scheme to the south of the site.</p>	
IC011/140	Thistleberry Residents Association	The Plan informs us of a large increase in the elderly population during the Plan period. There appeared to be no statistical evidence to support this. Does the Plan intend to build sufficient accommodation for this group to replace all the care homes closed in the last few years	The evidence demonstrating the ageing population is set out throughout the SHMA. The need for older persons accommodation is described in chapter 8 of the SHMA. The Joint Local Plan will seek to meet the identified needs for older persons accommodation.
IC012/165	Keele University	The identification of students as a specific housing group is noted and supported (para 2.9).	Support for the student population to be identified as a specific housing group is noted.
IC012/169	Keele University	The need for further investigations into the case for high value housing is noted and supported (para 2.37). Although the case for high value housing needs to be clarified, the provision of high quality housing, at a lower price level than	Supporting comments noted. The councils are aware of the distinction between high value and high quality housing and will

		<p>'high value' housing, should not be unrealistically constrained on the mistaken assumption that it is only high value housing which is 'high quality'.</p> <p>- It is correct to consider and address the need for additional student accommodation. Any discussion of the need for additional student accommodation must include embrace both quantitative and qualitative issues, the latter having assumed greater importance as a reflection of evolving student, parent and value for money expectations.</p>	<p>continue to ensure that this is made clear in future consultations.</p> <p>Support for identifying student accommodation needs is also noted and the councils will consider the quality as well as the quantity of accommodation required.</p>
IC013/180	Staffordshire Chambers of Commerce	It is appropriate to identify student housing as an issue. The ability of Staffordshire and Keele Universities to attract more students to the area will rely increasingly on the availability of high quality student accommodation to meet the aspirations of young people and their parents.	Support for addressing the needs for student accommodation is noted
IC013/184	Staffordshire Chambers of Commerce	We agree that further investigations are required to determine the need for high value housing in the area, (para 2.37). There is anecdotal evidence that local employers are having difficulty attracting higher income earners and highly skilled staff owing to a lack of executive housing.	Support for further evidential work to understand the need for high value housing is noted.
IC015/198	Richborough Estates	Additionally, Newcastle Borough Council should update its Executive Housing Market Report (2010) as advised in the SHMA 2015. The lack of executive housing is a longstanding and acknowledged problem and explicit policy support for high quality, larger housing would incentivise inward investment and attract wealth creators to the area, to the economic benefit of the conurbation.	Support for an update to the Executive Housing Market Study is noted.
IC024/246	Mr J Poole	It is recommended that further supplementary work is undertaken as part of the Strategic Housing Market Assessment to investigate the need for executive housing further. Such work should involve engagement with local business leaders, the Local Enterprise Partnership and the Chamber of Commerce. Work should also be undertaken that utilises the expertise of local agents to determine the most suitable locations in or on the edge of the City that could sustain high value housing. The supporting evidence that we have provided in support of application number SOT/57694/OUT, provides a robust starting point for further work, and clearly demonstrates that Lightwood is one such location that possesses a high quality, desirable environment where existing properties already command higher levels of house prices and house types suited to aspirational and highly skilled entrepreneurs.	The councils note that additional work may be required to assess the need for executive/higher value housing. This work is also recommended in paragraph 8.74 of the SHMA. As suggested, any such new study would require engagement with key stakeholders.

IC024/243	Mr J Poole	<p>The provision of high quality/specification or executive housing seeks to meet the aspirations of existing and future residents on higher incomes, both in the interests of greater social inclusivity and to remove a barrier to the pursuit of economic prosperity. A broader housing choice is essential to accommodate the changing aspirations of the resident population and to retain graduates and attract new economically active more mobile households into the area.</p>	<p>Support for a wider choice of high quality housing, including executive and higher value housing, is noted.</p>
IC024/245	Mr J Poole	<p>The need for executive housing is highlighted by many local business leaders who have written to the council to support the proposals for executive housing. The attached summary brochure at Appendix 3 contains extracts of the comments made by business leaders and executives in the City, which highlight that many of these businesses struggle to attract and retain high quality recruits because of a lack of suitable housing in the City.</p> <p>In tandem with tackling other economic development issues, there is therefore a clear and demonstrable need to include within the emerging Local Plan policies and suitable site allocations (with appropriate design briefs) to deliver high quality, low density executive housing in Stoke-on-Trent.</p>	<p>The councils note that additional work may be required to assess the need for executive/higher value housing. This work is also recommended in paragraph 8.74 of the SHMA. As suggested, any such new study would require engagement with key stakeholders.</p>
IC024/247	Mr J Poole	<p>The Government is keen to support the provision of serviced plots for self-build and custom build housing.</p> <p>When developing the Local Plan, the Council should seek to provide robust policies, and identify sites where serviced plots could be provided for self-build housing. Such allocations should be guided by a detailed design brief, and any future alterations in these areas should be controlled by an Article 4 Direction or other suitable planning mechanism to secure the design quality of the area.</p> <p>Should the council propose suitable sites for self-build housing, then a variety of plot sizes should be provided to allow for the provision of a mix of self-build housing to be provided to provide a wider opportunity for such plots to be developed.</p>	<p>The Housing and Planning Act requires local authorities to identify sites that are suitable for self-build and custom housing. Therefore, both councils will consider this as part of the future work on the Joint Local Plan.</p>
IC028/275	Henry Davidson Developments	<p>Para 2.38 of the emerging Local Plan refers to the planned increase of the student base of Keele University by around 3,000 students and recognises that there may be an increased demand for student accommodation in Newcastle-under-Lyme, to be provided by the private sector, if the University cannot accommodate this growth. This may need to be met through additional purpose-built student accommodation.</p> <p>HDD concurs with this analysis. The emerging HDD proposals can deliver a mixed-use scheme, with a substantial element of purpose-built student</p>	<p>Support for the provision of student accommodation is noted.</p> <p>The identification of individual schemes to meet the identified needs will be considered later in the plan preparation process.</p>

		<p>accommodation within a sustainable town centre location that will bring a number of benefits to the town centre. The emerging Joint Local Plan goes on to recognise (para 4.16) that “a wide range of uses can be beneficial to centres in order to generate activity and footfall.” The Student Housing element of HDD’s proposals will therefore assist the Local Planning Authority in meeting two of the key challenges that they have identified, namely:</p> <p>“Providing enough student accommodation to support the success of the local universities without impacting on the general supply of housing” (pg. 27); and</p> <p>“Ensuring that new housing and business strengthen the role of centres or support the economic sustainability of centres” (pg. 43)</p>	
IC047/375	Atherton Family	<p>In economic development terms, the regeneration of the potteries conurbation will rely upon attracting entrepreneurs or wealth creators who will be discerning in their choice of residence. The availability of a housing stock within the middle and upper matrix of the market will often determine their decision as to whether to bring their inward investment to the area or not. We firmly believe the lack of quality housing in the area has severely handicapped the regions regeneration following the demise of its historic industrial foundation. Further development at Baldwin's Gate can help to address that situation.</p>	<p>Support for a greater choice of middle and upper income housing is noted.</p> <p>The potential sites and locations for future housing development will be explored at the Strategic Options stage.</p>
IC050/394	SOTCC Regeneration and Development Team	<p>The city may not have helped itself by a stated focus on high value 'executive housing', again of the type offered by neighbours in what are currently largely more attractive locations. There is no doubt that that a sustainable city needs to enjoy a wide demographic base but logically this particular market would be a natural development of a succeeding city rather than being one capable of being shoe-horned into a city with clear strategic challenges</p>	<p>Comments noted regarding the focus on high value/ executive homes. Further consideration will be given by the councils regarding additional evidence that may be required to assess the need for executive and high value homes.</p>
IC052/410	NFU	<p>The document does not include any policy guidelines on rural workers dwellings. As mentioned above, this is likely to be an issue for the area as HS2 progresses and therefore should be addressed by this document. A policy needs to provide for a range of accommodation types to meet established local need, which should include dwellings to house people employed in agriculture.</p> <p>Farmers do have relatively new permitted development rights, whereby they can convert redundant agricultural buildings to up to three C3 residential units with a total floor space of 450m<sup>2</sup>. However this will not meet all the needs of farms and rural businesses.</p> <p>When new dwellings are constructed for farm businesses it is important that they are large enough to cope with the many demands of the farm business, together with the needs of a farming family. A farmhouse will almost certainly</p>	<p>Support for the provision of agricultural workers dwellings is noted, however there is no clear link to be made between HS2 and the need for such dwellings.</p>



		<p>require adequate space for a farm office. It will also require an entrance porch and utility area where soiled outdoor work clothing can be stored and washed in a space separate to the main living accommodation. This is important for maintaining adequate biosecurity measures. These needs are often not met by an 'off the shelf' design for an affordable home.</p> <p>It is also important to recognise that an agricultural dwelling must be flexible enough to accommodate families at a range of life stages. Farming families do not have the option of moving house if they should outgrow their home and this must be recognised when planning new accommodation</p>	
IC058/426	Steve English	<p>High value housing is needed to attract business investors/pioneers of industry to the area and inevitably many will prefer to live in more rural locations which the LA claim is unsustainable. Conversley the LA (particularly) NCBC support the development of large scale residential development in similar locations in order to meet its 5 year residential land supply and so have a totally contradictory stance. The insistence on the inclusion of affordable housing in such developments "across the board" is short sighted and further evidence of contradiction since low income families are the least likely to be abkble to afford private transport without further support. Public transport in such locations is often poor or non-existent and is beyond the control of the LA. To avoid these issues the LA should other than where parish needs surveys demonstrate a genuine local shortage all affordable housing should should be located on urban sites where residents will benefit from communal facilities and transport.</p>	<p>The concerns regarding the location of affordable housing in inaccessible rural locations are noted; however the comments are made in the context of the current situation with no new local plan in place, whereas this consultation is focused on what the Joint Local Plan can do to address such issues affecting the plan area. The councils will begin considering the most appropriate locations for high value and affordable housing at the Strategic Options stage. (see also reference to IC058/428 – Affordable Housing).</p>
IC062/449	Marshall Fear	<p>The amount of new build student housing has to be carefully managed so as not to upset existing areas with high student housing such as Shelton. If students move out these areas in significant numbers, the area could suffer as a whole.</p>	<p>Comments are noted. The managed transition of student accommodation will be explored through the Joint Local Plan process.</p>
IC067/498	Christopher Preece	<p>Over 55yrs Housing needs. There is a large demand from elderly people to move to bungalows from larger freehold property. This is uneconomical use and thus expensive.</p> <p>Proposal, To build two story properties with ground floor purpose designed for elderly people. To include adequate sound proofing.</p> <ul style="list-style-type: none"> <li>o The first floor designed for younger couples all built to a high standard.</li> <li>o The properties would be best located within easy access to shops and bus routes.</li> </ul> <p>The elder occupants would have the assets to purchase the property freehold</p>	<p>Most of these comments are too detailed and prescriptive to be considered within the Joint Local Plan. However the councils do note the need to make the most efficient use of land, to provide high quality housing that meets the needs of the occupants and to provide new housing in accessible locations.</p>

		<p>and let or mortgage the first floor.</p> <p>Advantages.</p> <ol style="list-style-type: none"> <li>1) Maintains mixed community.</li> <li>2) Saves Land.</li> <li>3) Vacates a larger house making space on the housing ladder.</li> <li>4) Helps younger people to buy.</li> <li>5) Gives elderly access to assets in property vacated.</li> <li>6) Elderly would have more independence and control over their own affairs.</li> <li>7) This configuration need not be restricted to elderly occupation.</li> </ol> <p>REF - Lisa Harris. Over 50s Specialist Saga. Told the mail in the UK we really do face a housing crisis.</p> <p>With reference to elderly accommodation, locally I have contacted many people with three bedroom houses how are ready to move to smaller properties</p>	
IC068/506	Gary Deane	Support the Councils findings that: High value housing is required to attract a skilled and well paid workforce but more evidence is needed to understand what the implications are locally.	Supporting comments noted.

**Issue 7 – Gypsies and Travellers Accommodation**

Reference	Consultee	Comments	Officer Comments
IC011/141	Thistleberry Residents Association	<p>We are not aware of the update of the Gypsy and Traveller need assessment. We would like to see this document. The increase of one pitch in Newcastle seems improbable as a forecast. However, the provision of a transit site in each LA would be welcomed.</p> <p>Unless robust data is forthcoming then quantitative statements made in the Plan are subjective and speculative and any resultant remedies are unlikely to address any real issues/challenges/problems that might exist.</p>	<p>The Gypsy &amp; Traveller and Travelling Showperson Accommodation Assessment is available to view on either council's website. The same applies to all other supporting evidence that was commissioned to inform the preparation of the Issues Consultation Document. For clarification, the 1 pitch required in Newcastle is an existing shortfall that the study suggests should be met before 2019. The longer term need in Newcastle is for a further 6 permanent pitches and 5 transit pitches up to 2034. These figures</p>

			are all set out in paragraph 2.41 and the associated key messages in the Issues Consultation Document
IC022/238	Joan Walley	I agree with the conclusions that additional traveller site places will be needed. Failure to ensure sufficient site provision, public or private, has led to unacceptable levels of illegal camping on sites and needs to be remedied in the plan going forward.	Support for additional traveller site accommodation is noted.
IC040/351	Gordon Lancaster - Madeley Conservation Group	Permanent traveller site on brownfield areas remote from existing housing, plus vigorous use of existing law to ensure social responsibilities.	Support for traveller accommodation to be provided on brownfield sites is noted. The broad locations and types of sites where Gypsy and Traveller accommodation could be provided will begin to be explored at the Strategic Options stage. The use of law with regards to ensuring social responsibility is not a consideration for the Local Plan.
IC066/493	Elena Sudlow (Maer & Acton Parish Council)	Under housing, it was noticed that travellers are included but we wondered if migrants will also need to be considered.	Migration into the Joint Local Plan area originating from both the UK and international locations is considered within the overall objective assessment of housing needs. This is explained in detail within the SHMA.

### Housing Technical Paper

Reference	Consultee	Comments	Officer Comments
IC009/64	Councillor Derek R Davies - NDP Steering Group	<p>There are errors and omissions in the data on completions presented in Tables 2, 3 and 5 of the Housing technical paper (see further below). The totals for permissions and net completions across the period should be 10893 and 5798, respectively, meaning that only 53% of dwellings granted planning permission were actually completed.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> This is yet another indicator of a weak housing market and that there is insufficient demand to indicate a 58% increase in dwellings over the Plan period.</li> <li><input type="checkbox"/> SoT and NuL need to determine and address the main cause of this significant lack of completions.</li> </ul>	The councils acknowledge that the 2014-15 figure of 2,196 residential units granted planning permission was omitted from the calculation of total and average figures in Table 5; however this has not affected any relevant key messages or key challenges within the Issues Consultation Document. The percentage of approved dwellings that were completed is not identified within the

			consultation document. This is another indicator of a weak housing market and we will continue to investigate the issues surrounding this. However, this on its own does not mean that there is no need for an overall increase in the number of new dwellings to be delivered by the Joint Local Plan.
IC009/65	Councillor Derek R Davies - NDP Steering Group	<p>Errors in Tables 2 and 3, page 8</p> <p>The following raise questions about the accuracy of the data presented for NuL in the Housing technical paper and the quality of NuL's record keeping.</p> <ul style="list-style-type: none"> <li>□ Table 2 Either errors of simple addition/subtraction (NuL column) or error in record keeping on gross completions.</li> <li>□ Table 3: NuL has no data on the number of affordable housing units completed in 2014/15 and had to derive the number from HCA Housing Statistics.</li> <li>□ Table 3: NuL has no data on the numbers of flats and houses completed in 2014/15.</li> </ul>	<p>Newcastle-under-Lyme officers acknowledge that there was a miscalculation error of the gross completions figure for 2014-15 which omitted two dwellings and that there was one net additional dwelling resulting from a change of use that had been omitted in the 2014-15 row in Table 2. This has had no overall effect on any conclusions that can be drawn from this table.</p> <p>In regard to Table 3, there is no requirement for data on flats and houses to be collected, but Newcastle-under-Lyme officers will consider the merits of collecting this data in the future. Finally, the use of HCA statistics is considered appropriate as registered providers of affordable housing submit their data on new housing in their ownership to the HCA and not the Borough Council.</p>
IC009/66	Councillor Derek R Davies - NDP Steering Group	<p>Errors in Table 5, page 9</p> <p>The following raise further questions about the accuracy of the data presented in the Housing technical paper and the quality of record keeping.</p> <ul style="list-style-type: none"> <li>• 2014-15 permissions omitted from addition in column on planning permissions; and consequent incorrect total and average.</li> <li>• 2006-07 incorrect number of net completions; and consequent incorrect total and average.</li> <li>• False comparison of totals and averages across the three columns.</li> </ul>	<p>The councils acknowledge the errors highlighted within the tables, however these have not affected any relevant key messages or key challenges identified within the Issues Consultation Document. Both councils will review the data presented in these tables and ensure that they are revised in future publications.</p>

IC009/67	Councillor Derek R Davies - NDP Steering Group	<p>Housing strengths and weaknesses, pages 21-22 The points listed as strengths indicate a low demand for housing.</p> <p>Strengths</p> <ul style="list-style-type: none"> <li>• Good supply of brownfield land. <ul style="list-style-type: none"> <li>– Indicates dereliction and lack of demand</li> </ul> </li> <li>• Good supply of sites with planning permission for housing development in Stoke-on-Trent. Indicates lack of demand; housebuilders would have built sites out if there was a prospect of sales.</li> <li>• Slight recovery in the housing market is likely to improve development viability within the area. <ul style="list-style-type: none"> <li>– Indicates lack of demand.</li> </ul> </li> <li>• Location of Stoke-on-Trent and Newcastle-under-Lyme in relation to Manchester and Birmingham gives good access to wider centres. <ul style="list-style-type: none"> <li>– It is difficult to see how the ability to depart from SoT and NuL for centres with far stronger economies qualifies as a strength.</li> </ul> </li> <li>• Rental Values continue to be lower than regional and national averages with little evidence of rental increases over recent years. <ul style="list-style-type: none"> <li>– Indicates lack of demand.</li> </ul> </li> <li>• Both authorities have historically seen lower house prices when compared against adjoining authorities, however there are notable spatial variations across the housing market area. <ul style="list-style-type: none"> <li>– Indicates lack of demand.</li> </ul> </li> <li>• Housing delivery has remained relatively consistent in Newcastle-under-Lyme, despite the recession. <ul style="list-style-type: none"> <li>– Indicates lack of demand.</li> </ul> </li> <li>• Housing is relatively affordable in Newcastle-under-Lyme and Stoke-on-Trent compared to surrounding areas and national averages. <ul style="list-style-type: none"> <li>• – Indicates lack of demand.</li> </ul> </li> </ul>	<p>Comments noted. Where a negative interpretation can also be made, it has already been presented as a weakness within the same table (e.g. good supply of sites vs. planning permissions housing have not always been built out). The councils have already considered these strengths and weaknesses together in order to help identify the key messages and key challenges that are presented in the Issues Consultation Document.</p>
IC009/68	Councillor Derek R Davies - NDP Steering Group	<p>Many of the points listed as weaknesses are not housing indicators but economic and social indicators.</p> <p>Weaknesses</p> <ul style="list-style-type: none"> <li>• There is a high reliance on the social rented sector. <ul style="list-style-type: none"> <li>– Indicates low-wage economy and weak jobs market</li> </ul> </li> <li>• Notable spatial variation in house prices across the HMA. <ul style="list-style-type: none"> <li>– Indicates need for housing regeneration.</li> </ul> </li> <li>• Some areas in the City experience high levels of vacant stock, particularly in the Inner Urban Core.</li> </ul>	<p>The housing market is underpinned by both social and economic factors and this is fully illustrated within the SHMA and the Housing Technical Paper. It is therefore entirely appropriate to identify weaknesses within the local housing market area that are related to social and economic matters.</p>

		<ul style="list-style-type: none"> <li>– Indicates need for urban regeneration.</li> <li>• Historically, planning permissions for housing have not always been built out.</li> <li>– Lack of demand. House-builders will not build where there is no market for their products.</li> <li>• The amount of new additional housing delivered in both areas is substantially below future projected needs.</li> <li>– Indicates lack of current demand and calls into question accuracy of future projected needs Loss of residents to other areas, particularly skilled graduates.</li> <li>– Indicates low-skill, low-wage economy.</li> <li>• There are fewer large high-value properties when compared to neighbouring authorities and a comparatively limited number of high income earners within both authorities. This lack of housing choice may therefore cause households to move out of the area to access greater choice and creates a relatively low representation of households with higher income earners.</li> <li>– Low-skill, low-wage economy; residents cannot afford to choose high-value properties.</li> <li>• Weaknesses in the local housing market may have historically led to planning permissions for housing not being built out.</li> <li>– Lack of demand. House-builders will not build where there is no market for their products.</li> <li>• Stoke-on-Trent has a particularly weak housing market compared to surrounding areas (e.g. Newcastle-under-Lyme, Cheshire East, Staffordshire Moorlands etc.)</li> <li>– Lack of demand in depressed area with low-skill, low-wage economy.</li> <li>• Viability of land – The economic downturn has stimulated a sharp decline in land values.</li> <li>– Lack of demand.</li> <li>• Developer confidence in the area may have been reduced following the RENEW scheme.</li> <li>– Do not blame programmes to improve existing housing stock for lack of demand. SHMA comments that some planning applications in NuL were refused on the basis that they might negatively impact on the RENEW programme – this is not an indicator of lack of developer confidence, it is an indicator of lack of demand.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Poor quality of the private rented sector, which helps to accommodate those in need of affordable housing.</li> <li>– Lack of demand. Need for housing renewal.</li> <li>• The quality of student accommodation.</li> <li>– Need for housing renewal.</li> <li>• Perception of the area – The change in the economic landscape has created some environmental issues in the area.</li> <li>– Depressed economy, need for transformative change.</li> <li>• Past under delivery of housing against local housing targets in Newcastle-under-Lyme and Stoke-on-Trent.</li> <li>– Lack of demand. House-builders will not build where there is no market for their products.</li> <li>• Low paid jobs in the City mean that housing affordability is still getting worse, despite low house prices and rents (affordability is not considered to be an issue from outside the area). – Depressed economy and society, need for transformative change in education and skills, environment and economy</li> </ul>	
IC063/466	Judith Oppenheimer	<p>The following raise questions about the accuracy of the data presented for NuL in the Housing technical paper and the quality of NuL's record keeping.</p> <ul style="list-style-type: none"> <li>• Table 2 Either errors of simple addition/subtraction (NuL column) or error in record keeping on gross completions.</li> <li>• Table 3: NuL has no data on the number of affordable housing units completed in 2014/15 and had to derive the number from HCA Housing Statistics.</li> <li>• Table 3: NuL has no data on the numbers of flats and houses completed in 2014/15. Table 5, page 9</li> <li>• The following raise further questions about the accuracy of the data presented in the Housing technical paper and the quality of record keeping.</li> <li>• 2014-15 permissions omitted from addition in column on planning permissions; and consequent incorrect total and average.</li> <li>• 2006-07 incorrect number of net completions; and consequent incorrect total and average.</li> <li>• False comparison of totals and averages across the three columns.</li> </ul>	<p>Newcastle-under-Lyme officers acknowledge that there was a miscalculation error of the gross completions figure for 2014-15 which omitted two dwellings and that there was one net additional dwelling resulting from a change of use that had been omitted in the 2014-15 row in Table 2. This has had no overall effect on any conclusions that can be drawn from this table.</p> <p>In regard to Table 3, there is no requirement for data on flats and houses to be collected, but Newcastle-under-Lyme officers will consider the merits of collecting this data in the future. Finally, the use of HCA statistics is considered appropriate as registered providers of affordable housing submit their data on new housing in their ownership to the HCA and not the Borough Council.</p>

			The councils acknowledge that some incorrect figures were presented in Table 5; however this has not affected any relevant key messages or key challenges identified within the Issues Consultation Document. The councils will ensure that the correct figures are presented in future publications.
IC063/467	Judith Oppenheimer	<p>The points listed as strengths indicate a low demand for housing.</p> <p>Strengths</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Good supply of brownfield land. Indicates dereliction and lack of demand</li> <li><input type="checkbox"/> Good supply of sites with planning permission for housing development in Stoke-on-Trent. Indicates lack of demand; housebuilders would have built sites out if there was a prospect of sales.</li> <li><input type="checkbox"/> Slight recovery in the housing market is likely to improve development viability within the area. Indicates lack of demand.</li> <li><input type="checkbox"/> Location of Stoke-on-Trent and Newcastle-under-Lyme in relation to Manchester and Birmingham gives good access to wider centres. It is difficult to see how the ability to depart from SoT and NuL for centres with far stronger economies qualifies as a strength.</li> <li><input type="checkbox"/> Rental Values continue to be lower than regional and national averages with little evidence of rental increases over recent years. Indicates lack of demand.</li> <li><input type="checkbox"/> Both authorities have historically seen lower house prices when compared against adjoining authorities, however there are notable spatial variations across the housing market area. Indicates lack of demand.</li> <li><input type="checkbox"/> Housing delivery has remained relatively consistent in Newcastle-under-Lyme, despite the recession. Indicates lack of demand.</li> <li><input type="checkbox"/> Housing is relatively affordable in Newcastle-under-Lyme and Stoke-on-Trent compared to surrounding areas and national averages. Indicates lack of demand.</li> </ul> <p><input type="checkbox"/> Low paid jobs in the City mean that housing affordability is still getting worse, despite low house prices and rents (affordability is not considered to be an issue from outside the area). Depressed economy and society, need for transformative change in education and skills, environment and economy.</p>	Comments noted. Where a negative interpretation can also be made, it has already been presented as a weakness within the same table (e.g. good supply of sites vs. planning permissions housing have not always been built out). The councils have already considered these strengths and weaknesses together in order to help identify the key messages and key challenges that are presented in the Issues Consultation Document.



IC063/468	Judith Oppenheimer	<p>Many of the points listed as weaknesses are not housing indicators but economic and social indicators.</p> <p>Weaknesses</p> <ul style="list-style-type: none"> <li>• There is a high reliance on the social rented sector. Indicates low-wage economy and weak jobs market</li> <li>• Notable spatial variation in house prices across the HMA. Indicates need for housing regeneration.</li> <li>• Some areas in the City experience high levels of vacant stock, particularly in the Inner Urban Core. Indicates need for urban regeneration.</li> <li>• Historically, planning permissions for housing have not always been built out. Lack of demand. House-builders will not build where there is no market for their products.</li> <li>• The amount of new additional housing delivered in both areas is substantially below future projected needs. Indicates lack of current demand and calls into question accuracy of future projected needs.</li> <li>• Loss of residents to other areas, particularly skilled graduates. Indicates low-skill, low-wage economy.</li> <li>• There are fewer large high-value properties when compared to neighbouring authorities and a comparatively limited number of high income earners within both authorities. This lack of housing choice may therefore cause households to move out of the area to access greater choice and creates a relatively low representation of households with higher income earners. Low-skill, low-wage economy; residents cannot afford to choose high-value properties.</li> <li>• Weaknesses in the local housing market may have historically led to planning permissions for housing not being built out. Lack of demand. House-builders will not build where there is no market for their products.</li> <li>• Stoke-on-Trent has a particularly weak housing market compared to surrounding areas (e.g. Newcastle-under-Lyme, Cheshire East, Staffordshire Moorlands etc.) Lack of demand in depressed area with low-skill, low-wage economy.</li> <li>• Viability of land – The economic downturn has stimulated a sharp decline in land values. Lack of demand.</li> <li>• Developer confidence in the area may have been reduced following the RENEW scheme. Do not blame programmes to improve existing housing stock for lack of demand. SHMA comments that some planning applications in NuL were refused on the basis that they might negatively impact on the</li> </ul>	<p>The housing market is underpinned by both social and economic factors and this is fully illustrated within the SHMA and the Housing Technical Paper. It is therefore entirely appropriate to identify weaknesses within the local housing market area that are related to social and economic matters.</p>
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		<p>RENEW programme – this is not an indicator of lack of developer confidence, it is an indicator of lack of demand.</p> <ul style="list-style-type: none"> <li>• Poor quality of the private rented sector, which helps to accommodate those in need of affordable housing. Lack of demand. Need for housing renewal.</li> <li>• The quality of student accommodation. Need for housing renewal.</li> <li>• Perception of the area – The change in the economic landscape has created some environmental issues in the area. Depressed economy, need for transformative change.</li> <li>• Past under delivery of housing against local housing targets in Newcastle-under-Lyme and Stoke-on-Trent. Lack of demand. House-builders will not build where there is no market for their products.</li> </ul>	
IC029/283	Barratt Homes	<p>Analysis of the figures in Table 1 of the Housing Technical Paper indicates that the cumulative shortfall in Stoke-on-Trent since 2006 is 1,537 dwellings (3,593 net additional completions versus a target of 5,130 net additional dwellings i.e. 570 x 9 years). We note that the accrued shortfall of 1,537 dwellings sine 2006 equates to 2.69 years of supply in relation to the 570 dpa target.</p>	Additional analysis noted.

## Schedule of Comments – Economy

Economy: General Comments			
Reference	Consultee	Comments	Officer Comments
IC009/79	Councillor Derek R Davies - NDP Steering Group	The CSS SA8 aimed to increase the attraction of the area as a tourist destination around its industrial heritage. There is a lack of focus, in the Issues consultation, on NuL's rural heritage and its role in the rural economy.	Comment noted. Strategic aims in the Core Spatial Strategy (CSS) included fostering and diversifying the employment base of both urban and rural areas; and increasing the attraction of the area as a tourist destination.....based on the high quality environment in the rural area. In order to deliver those aims the CSS has a number of policies to direct a range of economic uses including rural diversification and a positive approach to rural enterprise. There are also saved policies in the Newcastle-under-Lyme Local Plan 2011 that support the conversion of rural buildings for small-scale employment uses. The Staffordshire and Stoke-on-Trent Economic Review 2013 identified a pattern of increasing jobs in rural areas based around tourism and leisure. This evidence will inform further stages of Joint Local Plan preparation.
IC009/80	Councillor Derek R Davies - NDP Steering Group	No information is provided on how NuL is positioned in terms of targets for broadband and internet speed and mobile phone connectivity, nor on any challenges to be addressed.  This is a particular issue for rural areas and the rural economy, and therefore needs to be addressed, especially with reference to the particularly in the Rural South, where the home working and SMEs exist and continue to evolve. Looking at Ofcom charts, the evidence points to better coverage outside of buildings in the Rural South area, but within buildings there are a number of spots with no	Comment noted. A primary aim of the Joint Local Plan is to encourage sustainable economic growth. Infrastructure and connectivity are important elements to support and sustain business and communities.

		coverage, which could have an impact on home working and SMEs expansion.	
IC009/102	Councillor Derek R Davies - NDP Steering Group	<p>The rural area as a landscape, natural and historical heritage asset belongs to the whole borough and its residents, not just to the rural population and its landowners – at whose expense it is maintained.</p> <p>While the rural area has an obvious and vital economic role through the extractive industries of agriculture, forestry and mineral extraction and opportunities for rural-based business, the rural area as heritage asset has a major economic contribution to make in terms of:</p> <ul style="list-style-type: none"> <li>• both local and inward tourism</li> <li>• holidaying</li> <li>• land-based rural sports such as fishing, shooting and horse riding.</li> </ul> <p>It makes a further contribution in terms of the promotion of health and well-being through leisure activities such as walking, cycling and the study and appreciation of the natural environment and its biodiversity; and through educational opportunities. All of these activities too can render an economic return.</p>	Comment noted, Acknowledge the value of the rural landscape to the economy, health and well-being of the plan area.
IC011/147	Thistleberry Residents Association	Page 39 Omits the teaching hospital as a contributor to the local economy.	Comment noted. The comment was made against the City, Town and Other Centres chapter but officers feel that it is more relevant to the Economy chapter. The importance to the local economy of the Royal Stoke University Hospital is recognised by both councils and will be considered further as work continues to develop on the Joint Local Plan.
IC052/412	NFU	Paragraph 3.6 states that the “large rural area within Newcastle-under-Lyme has an economy based on agriculture, food and drink and other related professional and private services.” However there is no other mention of farms and rural businesses within the paper. The NFU would like to see a considerable strengthening of the support shown for the rural economy in this document. We are concerned that many thriving agricultural businesses in the area will be disadvantaged by the lack of specific support for the continued development of the rural economy in the current draft	Comments noted. The importance of the rural economy is considered in the Joint Employment Land Review. Agriculture contributes most to the rural economy. However, with the exception of gas and oil agriculture provides the least number of jobs across the plan area and furthermore future forecasts do not identify agriculture as a key driver for future job growth and instead predict job losses (section 8.28). It would therefore be wrong to overstate the role of agriculture in the borough's economy as a whole. Nevertheless, responsible agriculture is very important to

			<p>protecting the countryside, delivering improvements to the environment, supplying food and supporting a unique way of life and shaping the borough's identity. In accordance with section 112 of the NPPF local authorities are only required to take into account the economic benefits of the best and most versatile agricultural land, and where significant development of agricultural land is demonstrated to be necessary LPAs should seek to use areas of poorer quality land in preference to that of a higher quality. References to the 'rural economy' do include agriculture and other rural businesses. Evidence on rural economy will inform further stages of Joint Local Plan preparation.</p>
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**Issue 1: Future Employment Land Requirements over the Plan Period**

Reference	Consultee	Comments	Officer Comments
IC005/25	St Modwen	<p>The Employment Land Review identifies a significant range of required employment land; 190 – 334 hectares. This range represents the difference between supplying sufficient employment land just to meet the needs of the projected population growth to supplying sufficient land to meet a continuation of past development trends and projects of future economic growth.</p> <p>4.2 The greater figure is strongly advocated in order to seek the greatest benefit to the joint authority area and to secure a long term future of economic growth and stability. The Employment Land Review needs a thorough and detailed review particularly in respect of supply and demand. A number of inconsistencies have been identified and will be identified to the local planning authority.</p> <p>4.3 It is also important to set out whether the requirements are gross or net figures. Whilst seeking to avoid adding unnecessary rigidity to historic employment uses, the Council should also seek to release unused commercial sites for other uses.</p>	<p>Noted - The Employment Land Review represents a starting point with regard to providing evidence with respect to the allocation of employment sites within the Joint Local Plan which are required to meet the area's needs. As with all supporting evidence, this will be kept under review to ensure that it is up to date. Paragraphs 3.13 to 3.16 of the Issues Consultation Document provide a commentary on this. The requirement figures are net additional, on top of existing employment land that is</p>

		Given the capability of older or unviable commercial sites to be redeveloped for residential use, it is essential that along with creating new commercial floorspace, the overall provision continues to increase. Annual monitoring of losses of employment land is recommended to ensure the continued delivery of employment land.	occupied and operational in the plan area. Allocations will be set out within the Draft Joint Local Plan. Annual monitoring of the loss of employment land is undertaken by both authorities and it is recognised that the quality of land for employment use is as important as the quantitative assessment.
IC009/69	Councillor Derek R Davies - NDP Steering Group	Ageing population, NuL, particularly in the Rural South.  Note that this sector of the population will not provide workforce growth in Newcastle. Technical paper for NuL states: “the identification of need range [for employment land] has been informed by an analysis of the projected demands generated from a growing population” [italics added]. The discussion is contradictory; an ageing population will not generate the level of growth stated.	The Joint Employment Land Review identifies the need for economic development to be delivered within Newcastle-under-Lyme and Stoke-on-Trent by the new Joint Local Plan. The section referred to covers the range of amounts of employment land required across the plan area. The first is in relation to meeting demands from population growth, and the second the amount to meet a continuation of past development trends and projections for economic growth. The Technical paper makes no comment in this paragraph of where this workforce will come from.
IC009/74	Councillor Derek R Davies - NDP Steering Group	There is a suggestion that employment land in one authority could potentially meet the needs of the other: SoT has an under-supply of land, whereas the forecasting scenario indicates that NuL has an over-supply of land. <ul style="list-style-type: none"> <li>• ELR para. 5.21 states that at 220ha there appears to sufficient supply of employment land to meet the lower end need. Even using median figures (e.g. 262ha as the median), it could be said that there is sufficient land for future need; but the development of this land is the challenge, as opposed to looking for more land for employment purposes.</li> <li>• It would be over-ambitious to work to top-end figures, given the economic uncertainty both in SoT/NuL and in the UK overall; also taking account of recent past trends in SoT/NuL). Furthermore, considering that the ELR does not consider future provision of office space to be a problem, this can be taken out of the equation.</li> <li>• Full economic growth: Again this is ambitious, looking at uncertainty in the UK</li> </ul>	Noted - The Employment Land Review represents a starting point with regard to providing evidence with respect to the amount of employment land required within each authority area. Further work will be undertaken with regard to ensuring that housing and economic growth projections are looked at together before the employment land requirements are set out more fully within the Draft Joint Local Plan.

		economy and past trends.	
IC009/82	Councillor Derek R Davies - NDP Steering Group	<p>The statement that NuL “adjoins the City of Stoke-on-Trent ... but also contains the town of Kidsgrove, the villages of Silverdale and Keele and small rural settlements such as Audley” (ELR para. 3.3) is misleading, as it should show the bigger picture.</p> <ul style="list-style-type: none"> <li>• The whole rural area of NuL, including Whitmore and Baldwins Gate, Maer and Aston, Chorlton, and other strategic points such as Loggerheads, is worthy of identification and deserving of emphasis equal to that given to SoT (the Potteries), so that its distinctive identity can be maintained and it is not either ignored or “swallowed up” by the neighbouring city.</li> <li>• There is no acknowledgement in the Issues consultation of the Rural South’s close neighbours – Staffordshire /Cheshire/Shropshire. Here the salient point is that the Rural South, is adjacent to three neighbouring local authority areas (Staffordshire / Cheshire / Shropshire) and also some distance away from the industrial area of SoT. This highlights who the beneficiaries of large-scale rural housing development are likely to be</li> </ul>	<p>Comments noted. The quote from the Joint Employment Land Review is taken from the consultants’ description of the Borough and does not need to list all of the Borough’s settlements. The Issues paper focusses on the Joint Local Plan area and does not describe the geographic relationship with its neighbouring counties. Duty to cooperate discussions with adjoining authorities will all be considered at the Strategic Options stage.</p>
IC011/143	Thistleberry Residents Association	<p>We would like to know the statistical evidence on which the number of hectares of land is calculated re economic need given that the number of people working from home is increasing. Wouldn’t this make the operational base of any business smaller? Chatterley, on which much public money has been spent, we are told, remains empty. We would agree that given the changes to economy type over the last decade or so the division of industry and other uses might need to be re-thought within urban areas. The automatic response to economic land should not be to dip into the countryside or the Green Belt. Thus change of use might be a welcomed alternative provided this is done in a sensitive way.</p>	<p>Noted. The Employment Land Review represents a starting point with regards to providing evidence with respect to the amount of land required within each authority area. The projections used to inform the Employment Land Review are drawn from the latest economic forecasts which take into account changing working patterns. Further work will be undertaken with regards to economic growth projections and employment portfolio as we progress towards the Draft Joint Local Plan.</p>
IC020/220	Wardell Armstrong	<p>The assessment of the future economic growth and performance of ‘Stoke and Newcastle’ is a key driver of the Plan strategy, not only for the economic strategy, but also for the housing strategy. The Plan evidence base seems to point to a growth rate range of which points to the need for 190 to 334 hectares of new employment land and between 1,177 and 1,504 new homes. However, the forecasted growth seems to stem from a single source of employment forecasts (Cambridge Econometrics) utilising a ‘policy on’ scenario. The Experian predictions seem to be better aligned to ambitious economic growth and would appear to suggest the 334 is indeed a minimum requirement.</p>	<p>Noted. The Employment Land Review represents a starting point with regards to providing evidence with respect to the amount of land required within each authority area. Cambridge Econometrics (“policy on”) is not the primary source of economic data used to base the Employment Land Review however it is considered to represent a positive, but nevertheless realistic uplift</p>

			on past trends. Further work will be undertaken with regards to the economic growth projections as we progress towards the Draft Joint Local Plan.
IC020/221	Wardell Armstrong	<p>It is unsure if the proposed growth rate and the number of new jobs is in line with national forecasts and those of the Local Economic Partnership (LEP) in Strategic Economic Plans, for example the Northern Gateway Development Zone Strategy, a collaboration for growth.</p> <p>The Plan needs to set out the assumptions and evidence supporting its judgements, with clear and coherent reasoning covering all the main economic factors. The implications of the apparent modest rate of economic growth are wide-ranging.</p>	<p>The Local Economic Partnership Strategic Economic Plan (SEP) is a key strategy document which needs to be taken into account by the Joint Local Plan however it is a not a primary source of economic data on which to base the Employment Land Review. This is the same for the Northern Gateway Development Zone. The ELR is based on a clear methodology set out in the National Planning Policy Framework and National Planning Policy Guidance Note. The policy-on scenario accounts for some additional economic growth which is based on known funded schemes (which are taken from the SEP). The Draft Joint Local Plan will draw together the evidence and strategies to set out the growth planned over the plan period.</p>
IC033/308	Severn Trent Water	<p>Employment Land Review identifies an overall need for 190 to 334 hectares of employment land to be delivered over the next plan period. As highlighted in the consultation, this range is identified from projected national economic change and does not take account of specific local economic circumstances and in particular specific growth aspirations identified in the Stoke and Staffordshire LEP's Strategic Economic Plan and the recently successful bid for Enterprise Zone status. The former includes a focus on rapid, planned growth of the conurbation centred on the city of Stoke-on-Trent and the latter focusing on seven key sites. To ensure that there are sufficient sites to fulfil local ambitious economic aspirations and in order to capitalise on the strategic location and access to the road and rail networks the area benefits from, the Council should consider the upper end of the range to be a minimum.</p>	<p>The Local Economic Partnership Strategic Economic Plan (SEP) is a key strategy document which needs to be taken into account by the Joint Local Plan however it is a not a primary source of economic data on which to base the Employment Land Review. This is the same for the Northern Gateway Development Zone. The ELR is based on a clear methodology set out in the National Planning Policy Framework and National Planning Policy Guidance Note. The policy-on</p>



		STW agrees with the key challenge that there is need to provide sufficient land to support economic growth across the plan area. Therefore, further analysis of the specific local growth aspirations should be undertaken to ensure the employment land requirement fully reflects the local position and is suitably ambitious.	scenario accounts for some additional economic growth which is based on known funded schemes (which are taken from the SEP). The Draft Joint Local Plan will draw together the evidence and strategies to set out the growth planned over the plan period.
IC036	Renew Land Developments	In line with aspirations to grow the economy, and make North Staffordshire a “net contributor” to the national economy, then the higher growth figure, that is aligned to the higher levels of job growth identified within the Employment Land Review should be pursued, and land identified to meet these needs, which should include a mix of brownfield and greenfield sites that are suitably located in close proximity to shops, services, public transport and the strategic road network.	Comments Noted. The points raised will be considered further as part of the work to prepare the Strategic Options and Draft Local Plan documents.
IC038/344	TFK Developments Limited	It is acknowledged that any outward growth of Stoke-on-Trent and Newcastle-under-Lyme would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN housing figure as well as employment allocations.	The Joint Local Plan has not reached a sufficiently advanced stage in it progress to identify whether Green Belt land is required to meet its objectively assessed need. The information provided through the updated evidence and consultation at the Strategic Options stage will explore what land is required and where. In any event a Green Belt Review will be required to look at the purposes of including land within the Green Belt. This will be undertaken prior to the identification of land for development.
IC072/559	Dean Lewis (Tim Dean)	<p>We have a number of concerns with this approach, as follows:</p> <ul style="list-style-type: none"> <li>• First, the JLP authorities appear to be ignoring a second credible source of forecasts, namely Experian, that are also available to them. Moreover, the Experian forecasts predict higher levels of growth than do the CE forecasts, so there is a risk that the CE-based forecasts may represent an under-estimate of the growth potential of the JLP area. In other words, there is a risk that the ‘top-end’ figure of 334 hectares is too low.</li> <li>• Second, even if the CE “policy on” forecast is accepted, the Councils’ approach appears to be to identify a single figure within the defined range. Any figure arrived that which is below the top end of the consultation range (i.e. 334 hectares) would potentially represent a restriction on the growth potential of the</li> </ul>	Noted. The Employment Land Review represents a starting point with regards to providing evidence with respect to the amount of land required within each authority area. Cambridge Econometrics (“policy on”) is not the primary source of economic data used to base the Employment Land Review however is considered to represent a positive, but nevertheless realistic uplift on past trends. Further work will be

		JLP area. However, any such restriction would be inappropriate, not least because it would imply a constraint on the growth ambitions and aspirations of the area, including the commitments made to the Strategic Economic Plan for Staffordshire, the City Deal for Stoke-on-Trent and the local Enterprise Zone. Setting aside these issues, the desired levels of job growth in Stoke-on-Trent and Newcastle-Under-Lyme should seek to deliver economic growth on an upward trajectory to promote greater prosperity but also importantly greater opportunity for the securing employment locally thus reducing the need to travel. This means building sufficient homes to meet the needs of growing and prosperous economy	undertaken with regards to the economic growth projections and OAN as we progress towards the Draft Joint Local Plan.
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## Economy Issue 2 – The Availability of Sites

Reference	Consultee	Comments	Officer Comments
IC002/5	St Modwen	Part of the site referred to as 'Land at Berry Hill' includes land adjacent to the Fenton Trade Park and is known as 'Fenton 25' – an area just under 10ha and previously allocated for employment use in the 1993 City Local Plan. Our view is that the Fenton 25 site should be allocated for employment land, unless it is agreed as part of the masterplanning exercise for Berry Hill that the 10 ha site should be used for other uses. We would welcome the opportunity to discuss the potential future uses of the Fenton 25 site as part of a discussion regarding the wider Berry Hill landholding with the City Council to inform the preparation of the Options for the Local Plan.	Noted - Fenton 25 is identified within the Employment Land Review as a good employment site and will therefore be considered as a potential site within the Draft Joint Local Plan
IC005/26	St Modwen	<p>The importance of allocating sufficient employment sites cannot be understated. This should incorporate sites previously allocated for employment, such as land at Etruria Valley. However, given the considerable number of brownfield, former employment sites within the Local Plan area, it is also essential that policies are flexibly worded, in line with the National Planning Policy Framework, to ensure that land is not sterilised from other uses where employment uses have not come forward or appear unviable.</p> <p>4.5 The location of employment sites is of critical importance. St Modwen control a number of sites either with planning permission or proposed for employment use – notably Etruria Valley, land at Trentham Lakes, and Centre 500, Lowfield Drive, Wolstanton (each identified on location plans at Appendix 1). These sites are all within existing employment areas and are suitable to provide employment-generating or employment-supporting uses.</p> <p>4.6 With regard to the development of Etruria, it is recommended that any employment allocation is given sufficient flexibility to allow for employment-</p>	Noted - Sites within and around Etruria Valley and Trentham Lakes are identified within the Employment Land Review as very good employment sites and will therefore be considered as potential sites within the Draft Joint Local Plan. With regard to double counting evidence based studies will look at housing, employment and other commercial sites can help to identify the best use for sites. Some sites may therefore be included in more than one evidence base study however it will be for the Draft Joint Local Plan to identify the preferred use/uses for a site and

		<p>supporting uses. These are the type of essential provisions that, although not traditional employment uses in themselves, help to support major employment locations. Such examples of these are hotels, restaurants, sports facilities (where ancillary to business occupation). The provision of these related facilities helps to attract and retain high quality employment users.</p> <p>4.7 It is also vital then when undertaking SHLAA/ELR work that site availability is cross referenced to ensure there is no double-counting, particularly as many of the brownfield sites within the area would be appropriate for either employment or residential uses.</p>	<p>identification of the mix of uses.</p>
IC005	St Modwen	<p>The Employment Land Review at paragraph 10.45 recommends the addition of a further Policy “to the effect that alternative uses on employment land will be permitted where the site can be shown to be no longer ‘fit for purpose’”. This recommendation is strongly encouraged as the viable redevelopment of vacant employment land would help in securing high quality residential or mixed-use schemes.</p>	<p>Support for the recommended policy wording is noted. Detailed policy wording such as this will be considered at the Draft Local Plan stage.</p>
IC006/35	Biffa	<p>It is noted that the LDF consultation states that, “Tarmac was fined for exceeding the permitted amount of waste at this site and accordingly if it was to come forward for B-use employment there would be a need to investigate this breach and if necessary take appropriate action before any development work occurs.” As such we wish to take this opportunity to clarify that Tarmac was fined £16,000 by the EA for infilling more than 204,500 tonnes under an exemption and filling outside the exemption area. Tarmac accepted the breach had occurred and stated that it was a genuine mistake and had co-operated with the EA throughout the process and there are no outstanding issues in relation to the breach. The infilling operation continues to be well managed and there are no outstanding issues with the EA, and furthermore Biffa has been monitoring the operation, as Landlord, to ensure that the site will be capable of built development. It is believed that the land will be in a condition that is satisfactory for the target uses and will not require significant remediation costs.</p> <p>A comment contained within the LDF consultation states, “... a good amount of earth has been excavated on this site which, as a result, is mostly uneven - the cost of backfilling and levelling this will constrain the probability of it been developed as an employment site - the cost of backfilling and levelling this will constrain the probability of it been developed as an employment site.” The time limit imposed on the extant planning permission to complete infilling to create a suitable an appropriate landform expires later in 2016 and whilst the majority of infilling has already been completed an application will shortly be submitted to</p>	<p>Comments Noted. The statements regarding the breach of the license for the site and its prospects for restoration were made in the Employment Land Review. This is an evidence document which has informed the Issues Consultation Document and the supporting technical papers, rather than being a consultation document in its own right. Other evidence, such as that referred to in your comment, will also be considered as work continues on the Joint Local Plan on the selection of sites for allocation.</p>

	<p>Stoke City Council to extend the timescale for infilling operations until 31st December 2018. This forthcoming application will seek sufficient time to allow completion of infilling to allow the site to be levelled off to facilitate appropriate final development platforms with one larger platform at 122m AOD covering approximately 9.3 hectares and a second smaller platform amounting to 1.4 hectares located close to the current site entrance. The peripheral areas comprise mainly of embankments and will be landscaped. The 122m AOD platform has been designed to adequately re-develop the site whilst also taking advantage of the existing screening and land elevations compared with adjoining land.</p> <p>Biffa Waste Services Limited are in the final stages of entering into a deal with a commercial developer to pursue redevelopment of the site for warehousing, retail and/or residential uses and as such when taking into account the completion of infilling at the site to create the development platforms the site is considered eminently suitable for redevelopment as commercial, retail or residential uses. As a result the comments that “uneven ground” and “financial viability issues” are considered as a barrier to development is erroneous as is the general commentary that “the cost of backfilling and levelling this will constrain the probability of it been developed as an employment site” as this is in effect already taking place in accordance with the extant planning permission for the site. Likewise, we see no reason why neighbouring land uses would be incompatible with redevelopment of the site for warehousing, retail and/or residential development. Furthermore, in terms of the comment that “potential ground contamination” is a barrier to development is not considered to be an actual barrier to development as the infill of the quarry has been appropriate with inert materials and in any event the redevelopment of any brownfield site would require appropriate site investigation prior to redevelopment.</p> <p>It is considered that the site has good access to the strategic road network, in close proximity to the A52 and A500 giving access to the M6 motorway to the north and south of the city centre. The site is 0.33 km to the south of Stoke railway station which provides direct trains to Manchester, Bristol and London Euston.</p> <p>A masterplan for the development of the whole site is being prepared with the commercial developer. A preliminary marketing strategy concludes that it has good prospects of being brought forward within the LDF timeframe.</p> <p>It is anticipated that a planning application could be submitted to Stoke City Council</p>	
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		by the end of 2016 or by 1st July 2018 at the latest and discussions will be held with Developers and the Planning Authority. As such the Local Development Framework consultation should include Fenton Manor Quarry (NLP Ref: ST18) as a potential site as the site is financially viable, suitable development platforms are being created through the infilling of the quarry with inert materials.	
IC006/36	Biffa	<p>Newstead Trading Estate (NLP Ref ST6)</p> <p>In relation to the above commentary Biffa Waste Services Limited offer the following comments:</p> <p>The boundary of this potential site for development includes Biffa's existing Materials Recycling Facility/Transfer Station as outlined in the commentary. Biffa are not seeking to comment on the suitability of the wider site for redevelopment which is owned by Severn Trent Water Limited, however, clearly the MRF/TS is a successful commercial development providing a valued service to the businesses in the Stoke area. As such Biffa which to make it clear that the existing MRF/TS identifies that at least this part of the site is in use and there is therefore in effect a clear market interest in that part of the site or no environmental constraint in the continued use of the facility.</p>	Comments Noted. Judgements regarding whether or not this site is appropriate for allocation and the extent of the area that may be appropriate will be made later in the plan preparation process. As a starting point the Employment Land Review proforma for the site, which is referred to in your comment, recommends that the site should not be considered for employment use.
IC009/59	Councillor Derek R Davies - NDP Steering Group	The Joint Employment Land Review, section 3.19, states that Stoke on Trent's "skills gap" is harming the city's growth prospects. This is evidence that currently there is no prospective growth in the job market in the area to support a 58% increase in dwellings. The stakeholder engagement (Appendix 1 of the SHMA) also states stakeholders' concern that the job forecasts presented are high compared to historic trends.	Comments Noted. The skills gap refers to the mismatch between the skills and qualifications of the workforce and the requirements of businesses offering employment opportunities in the area. This may mean that employers will seek employees from elsewhere to commute in for work, or companies will instead seek to locate elsewhere. This is considered to be unsustainable and constraining the economic potential of the area. Closing the skills gap will help to address this and is likely to uplift the need for housing in the plan area due to reduced in-commuting and increasing businesses locate in the area.
IC009/75	Councillor Derek R Davies	Green Belt (Issues consultation para. 3.23, p. 33): Development of employment land in the Green Belt would only need to be looked at if there were a substantial	The Joint Local Plan has not reached a sufficiently advanced stage in it

	<p>- NDP Steering Group</p>	<p>economic boom; again, in view of current/future uncertainty and past trends, this would be another over-ambitious option, notwithstanding the fact that once Green Belt is developed, it cannot be replaced/recovered for the enjoyment of future generations.</p> <ul style="list-style-type: none"> <li>• Both SoT and NuL continue to have a supply of vacant employment land available for development, which again indicates a surplus to the requirements of the continuing economic trend.</li> <li>• Vacancy rates are as follows: Office space: SoT 30%; NuL 25% Industrial premises: SoT 14%; NuL 15% (ELR para. 4.10)</li> <li>• “A typical ‘liquid’ market usually displays vacancy rates of around 8-10%, so the vacancy rates displayed in both areas suggests there is a large oversupply of both offices and industrial premises relative to demand, although the oversupply is most severe for office stock”) (ELR para. 4.11).</li> <li>• NuL: “Like in Stoke-on-Trent, local property agents consider that despite improved market conditions, speculative industrial development was very unlikely to occur in the area for the foreseeable future. This is partly due to a number of new schemes standing empty for several years prior to occupation in the previous economic/development cycle” (ELR para. 6.66). “For the longer term, there was a general view that one or more significant employment sites would be required with good access to the strategic road network, in particular the M6” (ELR para. 6.67). These are further justifications to remain within the bounds of reason when assessing land supply.</li> </ul>	<p>progress to identify whether Green Belt land is required to meet its objectively assessed need. The Employment Land Review represents a starting point with regards to providing evidence with respect to the amount of land required within each authority area. An allowance has been made in the modelling work to bring the level of commercial and industrial floorspace into balance. Further work will be undertaken with regards to the economic growth projections and OAN as we progress towards the Draft Joint Local Plan.</p>
<p>IC009/77</p>	<p>Councillor Derek R Davies - NDP Steering Group</p>	<p>The Issues consultation states that “there are currently no known sites that are immediately available for employment development in the rural area” (para. 3.28). It is accepted that saved policy E12 supports the conversion of buildings in rural areas for new employment purposes (ELR 2.26) but the focus is concentrated on larger industrial areas.</p> <ul style="list-style-type: none"> <li>• There are sites with unused/derelict buildings in the rural area that could be developed sympathetically to the rural setting, but no evidence is provided on these buildings (e.g. identifying buildings that could be repurposed for such things as agriculture, food and drink, and professional and private services).</li> <li>• However, an observer in the area could evidence this merely by taking a look at the Rural South’s dilapidated buildings. It is difficult to see in the consultation documents that any such appraisal has been undertaken or even commissioned on this.</li> </ul>	<p>The Joint Employment Land Review 2015, paragraph 6.85 states “There is very limited rural business space of any size or volume in either Stoke-on-Trent or Newcastle-under-Lyme currently. Furthermore, discussions with stakeholders and agents confirmed that there was no ‘hidden/ unmet demand’ for such space within the Study area.” A Call for Sites exercise was carried out in September/October 2014. This was an opportunity for local organisations and individuals to suggest sites that may be available for development over the next 15 to 20 years. People were able to submit sites</p>

			<p>for a wide variety of land uses including: housing, employment, retail, leisure and open space etc. There is a schedule on the website which summarises the responses the Councils had received as part of this exercise, including information such as suggested uses for the site. A number of relevant employment and economic development policies were saved from the 2011 Newcastle-under-Lyme Local Plan 2011 and continue to form part of the Development Plan for Newcastle-under-Lyme; one of which E12 supports the conversion of buildings in rural areas for new employment uses. Therefore there is a current policy that would support the conversion of rural buildings for employment uses. The re-use of rural buildings for employment purposes should be explored in further stages of Joint Local Plan preparation.</p>
IC009/78	Councillor Derek R Davies - NDP Steering Group	<ul style="list-style-type: none"> <li>• Building houses in the Rural South is not going to help fill any workforce gaps in NuL or SoT, in view of commuting issues. This is evidenced by the lack of adequate connective infrastructure between the rural and urban areas (causing reliance on car use).</li> <li>• When Rural South residents have no option but to travel by car, they are better off travelling by car into Cheshire, e.g. to Crewe for the railway link, Shropshire, in view of job prospects and ease of travel, and Staffordshire, e.g. to Stafford for the railway link.</li> <li>• Further, the main roads, A51 and A53, between the Rural South and NuL edge of town will be spliced up with HS2 construction traffic in the foreseeable future, which will seriously hamper travel from the Rural South into NuL and SoT. There is nothing said about this fact in the Issues consultation, i.e. if houses are to be built in the Rural South, the main commuting pattern will be to places of employment in other local authority areas.</li> <li>• Evidence in the ELR and SHMA sets out commuting flows, concluding that 79% of employed residents also work in the area and identifying SoT as</li> </ul>	<p>Comments noted. The Economy Technical Paper does acknowledge existing commuting patterns into and out of the Joint Local Plan area. The Government's proposals to construct a high speed rail link from London to Manchester and the potential impact on the plan area of such a proposal have not been taken into account in the Joint Local Plan process at this stage. The Government has set out the intention to locate the HS2 route between Fradley in the West Midlands and Crewe. Further consideration will need to be made regarding this government proposal as</p>

		<p>particularly pertinent in view of high levels of labour containment. The challenge for NuL will be to develop housing closer to the urban area of NuL, taking into account infrastructure and where, along the main routes, it can develop the housing to suit NuL's local employment needs.</p>	<p>the Joint Local Plan progresses. It is therefore recognised that HS2 will have implications for the Joint Local Plan process, as well as, the long term development strategy itself. This position will be kept under continual review as the development plan progresses and when appropriate evidence will be updated to take account of the proposal. Judgements regarding site allocations for housing and employment uses will be made later in the Joint Local Plan preparation process.</p>
IC009	<p>Councillor Derek R Davies - NDP Steering Group</p>	<p>Looking at the linkage between housing and the economy, as detailed in the Issues consultation, there is a workforce preference for more central locations with good access to public transport links; and participants in the stakeholder consultation highlighted that employment sites accessible only by car are no longer a preferred business option.</p> <ul style="list-style-type: none"> <li>• The provision of housing within the urban areas should be noted as a priority when assessing future need.</li> <li>• It is difficult for a reader of the Issues consultation to comprehend why NuL and SoT would advocate building housing in the countryside when all the evidence points to the need to attract a workforce that is located close to the urban economy.</li> <li>• The challenge here is to persuade developers, who have a preference to build unsustainable houses in more affluent areas in order to maximise their own profits, to build housing in locations where it will support and complement the local economy. The Issues consultation does not address how the LPAs will "tempt" developers to develop within town or city boundaries so as to house a future urban-type of workforce to meet economic needs.</li> </ul>	<p>Comments noted. The Joint Local Plan has not reached a sufficiently advanced stage to identify site allocations for housing; employment and other land uses to meet its objectively assessed need. The information provided through the updated evidence and consultation at the Issues and Strategic Options stages will identify what land is required and where.</p>
IC012/170	<p>Keele University</p>	<p>The key message at page 32 relating to the shortage of land to meet the needs of the top end projections is noted as is the recognition that the potential of land to the south and east of the new development site at Keele, as mentioned at para 3.23, needs to be fully assessed. This site, and other land within the University's ownership, has been promoted through earlier plan-making consultations and its suitability for meeting future development needs is re-affirmed.</p>	<p>Comments noted. The Joint Local Plan has not reached a sufficiently advanced stage to identify site allocations for housing; employment and other land uses to meet its objectively assessed need. The potential locations for future development and whether or not a</p>



		- It is appropriate to review previous employment allocations, to assess their suitability for alternative uses. (para 3.26) but such a review must have as its context the need for new, high quality sites which are well located to support growth and high value sectors in the local economy.	review of Green Belt boundaries may be required will be considered at the Strategic Options stage.
IC013/185	Staffordshire Chamber of Commerce	We note with some concern that there is a shortage of land to meet the higher end projections of the area's economic needs. We agree that additional high quality employment sites need to be identified. We are equally concerned that the policy imperative for residential might lead to existing sites allocated for employment purposes being re-allocated for residential uses. The ability to identify a five-year housing land supply needs to be balanced by a corresponding five-year employment land supply. Therefore, while it is appropriate to review previous employment allocations to assess their suitability for alternative uses, the review needs to identify alternative high quality sites which are well located to support growth in the local economy, (para 3.26).	Comments noted. An appropriate mix and portfolio of sites to be allocated for housing, employment and other land uses will be identified where appropriate in the Draft Local Plan.
IC024/249	Mr J Poole	It is therefore clear that in addition to improving the executive housing offer of the City to attract more business leaders and inward investment, there is also a need to identify, allocate and prepare a range of suitable and accessible sites to meet modern business requirements. Consideration should also be given to providing allocations and policies to support the provision of small business units to facilitate business start-ups in addition to the allocation of land to facilitate the growth and development of creative industries.	Comments Noted. Site allocations and policies to support small and medium enterprises will be explored and identified where appropriate in the Draft Local Plan.
IC027/263	Keele Parish Council	We are also concerned that there is very little in this document about the rural economy. Whilst we accept that it is hard to assess the contribution of farming to the local economy, some attempt should be made. To ignore a major economic activity within the Plan area is unwise.	See also response to IC052/412 above. Comments noted. The importance of the rural economy is considered in the Joint Employment Land Review. Agriculture contributes most to the rural economy. However, with the exception of gas and oil agriculture provides the least number of jobs across the plan area and furthermore future forecasts do not identify agriculture as a key driver for future job growth and instead predict job losses (section 8.28). It would therefore be wrong to overstate the role of agriculture in the borough's economy as a whole.

IC027/264	Keele Parish Council	The rural economy is not just about farming and housing. There are now many small businesses that are run from homes and the rural economy is far more complex and diverse than the Local Plan suggests. It is a major player in the economic prosperity of the area, providing services and leisure facilities to the neighbouring urban and sub-urban communities.	See also response to IC009/79. Comment noted. National policy in the National Planning Policy Framework supports economic growth in rural areas in order to create jobs and prosperity. Paragraph 28 of the NPPF sets out what Local Plans need to do to promote a strong rural economy, largely related to business growth and the success of rural communities. Whilst the Local Plan is not required to repeat national policy, further stages of Joint Local Plan preparation will inform Strategic Options and policy approaches for the rural area.
IC027/271	Keele Parish Council	The JLP is insufficient with regard to the rural economy. We believe more needs to be done to support a healthy rural economy.	See responses to IC027/271 and IC009/79.
IC031/293	Renew Land Developments	Stoke-on-Trent and Newcastle-under-Lyme have been heavily influenced in the past by the growth and development of heavy industry, manufacturing and mineral extraction. The relocation of these industries overseas to take advantage of proximity to emerging markets and cheaper labour has resulted in previous economic decline, leading to the City being left with a number derelict former industrial sites, and clusters of significant areas of smaller / poor quality housing stock around these areas that were constructed as homes for those employed in these industries.....However, the loss of these industries has not been replaced with a sufficient amount of high quality employment developments and buildings or high-tech businesses. The location of the area has made it an attractive location for storage and distribution centres, and whilst such uses have brought jobs with them, they have not brought with them a sufficient amount of highly paid employment or employment that requires specialist skills, expertise or higher level qualifications. Stoke-on-Trent and Newcastle-under-Lyme now both have two established and highly regarded universities, these being Keele University and Staffordshire University. The SHMA highlights a number of young people moving to the area to study, however the evidence suggests that students leave the area after their studies to pursue their careers elsewhere. This provides an indication that there is insufficient high quality employment available in the City to meet the aspirations of	Comments noted. Site allocations for higher value industries and policies to support small and medium enterprises will be explored and identified where appropriate in the Draft Local Plan.

		<p>graduates from our local universities. The local environment, the availability of a good mix of high quality housing stock and lifestyle offer of the City compared to other urban areas elsewhere in the country may also be factors that influence the decisions of graduates; however it is our opinion that the limited availability of a high quality employment offer is a major factor. It is therefore clear that there is a need to identify, allocate and prepare a range of suitable and accessible sites to meet modern business requirements. Consideration should also be given to providing allocations and policies to support the provision of small business units to facilitate business start-ups in addition to the allocation of land to facilitate the growth and development of creative industries.</p>	
IC038/343	TFK Developments Limited	<p>It is therefore clear that in addition to improving the housing offer of the City to attract more business leaders and inward investment, as well as provide a mix of housing to attract and retain graduates and younger populations, there is also a need to identify, allocate and prepare a range of suitable and accessible sites to meet modern business requirements. Consideration should also be given to providing allocations and policies to support the provision of small business units to facilitate business start-ups in addition to the allocation of land to facilitate the growth and development of creative industries.</p>	<p>Comments noted. Site allocations and policies to support small and medium enterprises and creative industries will be explored and identified where appropriate in the Draft Local Plan.</p>
IC038/345	TFK Developments Limited	<p>Policies and allocations should be pursued for delivering high quality employment sites for high-tech industries and high quality office parks in order to provide a high employment offer in the City to encourage more people to move into the City Centre and halt out-migration.</p>	<p>Comments noted. Site allocations and policies to support high technology industries will be explored and identified where appropriate in the Draft Local Plan.</p>
IC033/309	Severn Trent Water	<p>The Issues consultation recognises that there are insufficient sites to meet the middle to upper end of the employment land requirement identified in the Employment Land Review, which itself has not taken into account more ambitious local economic proposals. STW considers that the Council should be identifying additional sites in order to realise the full economic potential of the area.</p> <p>3.17 STW considers that the Council needs to allocate a range of sites in order to ensure that a responsive high quality supply of sites is available and the employment land supply is not restricted by a lack of suitable sites. STW therefore supports the need to review the Green Belt to ensure that appropriate sites are brought forward in the most sustainable locations to be of benefit to the needs of business and the workforce and in order to support the aspiration for a rapid, planned growth of the conurbation.</p>	<p>The Joint Local Plan has not reached a sufficiently advanced stage to identify whether Green Belt land is required to meet its objectively assessed need. The information provided through the updated evidence and consultation at the Issues and Strategic Options stages will identify what land is required and where. In any event a Green Belt Review will be undertaken to update this element of the JLP evidence base to look at the purposes of including land within the Green Belt. This will be undertaken prior to the identification of land to be allocated for development.</p>

IC038/345	TFK Developments Limited	Policies and allocations should be pursued for delivering high quality employment sites for hightech industries and high quality office parks in order to provide a higher level employment offer in the City to encourage more people to move to the City and halt out-migration	Comments Noted. Site allocations and policies to support high technology industries will be explored and identified where appropriate in the Draft Local Plan.
IC045/368	Stafford Borough Council	The document discusses the issue of employment needs. It is suggested that if the higher end of the Objectively Assessed Need is met then Green Belt release may need to be considered around Keele University and Science Park. The Borough Council are not in a position to make comment on this at this time.	The Joint Local Plan has not reached a sufficiently advanced stage in its progress to identify whether Green Belt land is required to meet its objectively assessed need. The information provided through the updated evidence and consultation at the Issues and Strategic Options stages will identify what land is required and where. In any event a Green Belt Review will be undertaken to update this element of the JLP evidence base to look at the purposes of including land within the Green Belt. This will be undertaken prior to the identification of land to be allocated for development.
IC050/396	SOTCC Regeneration and Development Team	A new approach to growth in Stoke-on-Trent is needed that brings a rapid increase in high quality homes and employment locations in the city, bringing with it a footfall and spend that can contribute to sustainable town centres.	Support for rapid growth in high quality home and employment locations in the city is noted. The specific amount, type and location of housing and employment development and how these relate to the town centres in the plan area will be explored further at the Strategic Options and Draft Plan stages.
IC070/515	Janet Simpson (Madeley Parish Council)	It was suggested that more emphasis needs to be placed on the role of developing and sustaining the local Rural economy-ensuring that good agricultural land is used for the production of food rather than housing development is essential.	Comment noted. The Agricultural Land Classification and soil resources will be taken into account through work in relation to the SHLAA and SA/SEA. Where significant development of agricultural land is demonstrated to be necessary we will seek to use areas of poorer quality land in preference to that

			of a higher quality. National Policy in section 112 of the NPPF covers this resource and will be taken into account as Strategic Options are developed. Issues and evidence concerning geodiversity (including management of soils) will inform further stages of preparation of the Joint Local Plan.
IC074/569	Craig Ball (Heaton planning)	We are making representations on behalf of Tarmac Ltd who are the landowners of the Walleys landfill site situated between Silverdale and Thistleberry .We would ask that careful consideration is given to potential future development in the area surrounding the Walleys landfill site to ensure appropriate safeguarding of existing uses present within the area. It is appropriate for a suitable stand-off to be provided for existing development from potentially sensitive receptors.	Comment noted – the Council sought to resist residential development near the site and refused planning permission for 138 dwellings on Hampton’s Scrapyard and adjacent field at Keele Road, Newcastle-under-Lyme. The subsequent appeal was allowed on 14 September 2016.It is highly unlikely that the Council could sustain a refusal on similar grounds near this or other similar sites in the future. This issue is already being considered within the SHLAA work and will also be considered as work on the Joint Local Plan progresses.
IC076/578	W Naylor	Land to the south and east of Keele science park. Does this mean Keele golf course? Is it in the remit of JLP to be able to alter Green Belt boundaries? Seems a dangerous precedent for many vulnerable Green Belt protected urban margins.	The NPPF states that Green Belt boundaries can only be reviewed by a Local Plan. Land south and east of Keele Science Park does not include the golf course. The full extent of this site can be found under site reference NL24 within the Employment Land Review.
IC077/587	Andy Perkin (Potteries Heritage Society)	We appreciate that planning for economic growth is crucial to the Local Plan and understand that (as stated in 3.25) some historic industrial sites may not be suitable to accommodate modern industrial or commercial uses and may need to be considered for alternative uses. As a heritage society, we are realistic about the adaptation of heritage assets but feel that significant change of use should only be used when it provides the best opportunity for restoration and reuse.	Comments Noted. The most appropriate future use for sites will be explored at the Strategic Options and Draft Plan stages. The effect of proposed uses on heritage assets will be a key consideration in this work.
IC079/602	Andy Perkin	We appreciate that planning for economic growth is crucial to the Local Plan and	Comments Noted. Sites will only be

	(on behalf of) Stoke Neighbourhood Forum	understand that (as stated in 3.25) some historic industrial sites may not be suitable to accommodate modern industrial or commercial uses and may need to be considered for alternative uses. We feel that significant change of use to key sites in Stoke should only be used when it provides the best opportunity for restoration and reuse.	considered for allocation or redevelopment where, all relevant planning matters considered, the proposed use will be the most appropriate and sustainable use of the site. The effect of proposed uses on heritage assets will be a key consideration in selecting sites for potential development.
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### Economy Issue 3: Economic Sectors

Reference	Consultee	Comments	Officer Comments
IC009/73	Councillor Derek R Davies - NDP Steering Group	<p>The Employment Land Review (ELR) does not demonstrate a case for future employment land need.</p> <ul style="list-style-type: none"> <li>• Newer ways of working that are identified will require less floor space to accommodate jobs, not more. This will affect the amount of land required for new employment development. In addition, losses of industrial land and buildings not expected to be as large scale as in the past, plus “data since 2010 shows an overall increase in industrial land” (Issues consultation document, p. 36)</li> <li>• The amount of office floor space in both SoT and NuL is increasing. This is evidence that office floor space is not a growing problem and should be taken out of the equation for employment space (ELR para. 4.50).</li> <li>• Also noted in the ELR, overall stock of both industrial and office space across the two authorities is increasing and vacancies are higher than ideal “‘liquid’ market levels, suggesting an oversupply relative to demand” (ELR para. 4.50).</li> </ul>	Noted. The Employment Land Review represents a starting point with regards to providing evidence with respect to the amount of land required within each authority area. The projections used to inform the Employment Land Review are drawn from the latest economic forecasts which take into account changing working patterns, vacant floorspace and an allowance has been made in the modelling work to bring the level of commercial and industrial floorspace into balance. Further work will be undertaken with regards to economic growth projections and employment portfolio as we progress towards the Draft Joint Local Plan.
IC009/76	Councillor Derek R Davies - NDP Steering Group	<p>Sustainability in the Rural South of the area could be met by encouraging small business, the self-employed and the work-from-home economy. This is very relevant but is not fully addressed in either the Issues consultation or the ELR, which appears to concentrate heavily on the industrial SoT area. Considering the size of the NuL rural area, with an economy based on agriculture, food and drink and other related professional and private services, there is considerable lack of detail for the rural economy.</p> <ul style="list-style-type: none"> <li>• The only acknowledgement of the rural economy is in reference to the</li> </ul>	See also response to IC009/79. Comment noted. National policy in the National Planning Policy Framework supports economic growth in rural areas in order to create jobs and prosperity. Paragraph 28 of the NPPF sets out what Local Plans need to do to promote a strong rural economy,

		<p>policies of SA9 of the Core Spatial Strategy: “diversification of traditional rural economies, with a ‘positive approach to rural enterprise’”. The focus of the Issues consultation is purely on the urban economy.</p> <ul style="list-style-type: none"> <li>• The government is looking to further embed Rural Proofing into policy formation and the impact assessment process.</li> <li>• Rural Proofing reads as: It is vital that UK wide government policy continues to be, where applicable, of benefit and relevance to rural areas across the whole of the UK, and needs to be rural proofed. This will provide more in depth analytical guidance that gives details of how to quantify the impacts of policy options (in cost / benefit monetary terms) on rural areas and also how to ensure proper comparison between urban and rural geographies.</li> <li>• Rural Proofing information should be made available and taken into account in the Issues consultation.</li> <li>• As detailed in the Issues consultation, NuL’s Economic Development Strategy 2012-2017 identifies high-quality jobs in leisure and tourism as being an economic strength.</li> <li>• <input type="checkbox"/> There is little detail on this issue in the documents, “new” industrialisation being the key narrative, particularly around SoT, with less focus on NuL.</li> </ul>	<p>largely related to business growth and the success of rural communities. Whilst the Local Plan is not required to repeat national policy, further stages of Joint Local Plan preparation will inform Strategic Options and policy approaches for the rural area.</p>
IC011/145	Thistleberry Residents Association	High quality jobs are intrinsically linked to a high quality workforce.	Comments noted
IC012/171	Keele University	<p>The key challenge at page 35 is not disputed in itself but it needs to be recognised that it might not be possible to meet the needs of business and the local workforce within single allocations based upon current patterns of employment and housing distribution. For example, Keele University offers significant employment opportunities but its workforce is spatially dispersed. In order to consolidate the importance of the Keele employment offer over a longer period, new employment and housing allocations need to be considered in the locality in a comprehensive manner.</p> <p>- The key message following para 3.36 is endorsed. The focus going forward will be on supporting growth sectors; regrettably, this support has not been consistently offered by key agencies in the recent past.</p>	<p>The Joint Local Plan has not reached a sufficiently advanced stage in its progress to identify whether Green Belt land is required to meet its objectively assessed need. The information provided through the updated evidence and consultation at the Issues and Strategic Options stages will identify what land is required and where, and whether or not a review of Green Belt boundaries may be required. This will be undertaken prior to the identification of land to be allocated for development.</p>
IC013/187	Staffordshire	We support the emphasis on developing low carbon industries, including the	Comments supporting the development

	Chamber of Commerce	district heat network and the Keele smart demonstrator, which will provide a stable energy supply for local industry and new employment opportunities in this developing sector, (3.36)	of low carbon industries and projects are noted. Provision for these within policies and site allocations will be considered at the Draft Local Plan stage.
IC020/222	Wardell Armstrong	The relationship between jobs growth and the labour force is complex and involves many judgements and assumptions. Options involving reducing the overall rate of jobs growth to minimise the increased rates of commuting and migration may result in lower rates of economic growth and fail to deliver the economic strategy. Options involving aspirational economic growth rates would probably require a higher number of jobs, involving much higher levels of growth in financial, professional and business services and construction, which are correctly optimistically set out in the Northern Gateway Development Zone prospectus. This might also exacerbate the situation in terms of increased rates of migration and commuting	Comments noted. It is recognised that there may be increased pressure on commuting and migration resulting from higher levels of job growth, however part of the role of the Joint Local Plan will be to secure the most sustainable pattern of development. The plan will therefore be required to respond to these pressures by ensuring that sufficient housing is provided in the plan area to accommodate the existing and planned future workforce.
IC052/413	NFU	<p>Paragraph 28 (NPPF) contains a very specific reference to supporting a prosperous rural economy; “Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”. It also states that plans should “promote the development and diversification of agricultural and other land-based rural businesses”. The Defra Business Plan also contains support for a prosperous rural economy. Priority 1 of the plan is to “Support and develop British farming and encourage sustainable food production. Enhance the competitiveness and resilience of the whole food chain, including farms and the fishing industry, to ensure a secure, environmentally sustainable and healthy supply of food with improved standards of animal welfare”.</p> <p>Bearing the above in mind the NFU would appreciate the opportunity to become involved in the formation of guidance on agricultural or horticultural developments in order to ensure that it is fit for purpose. The industry needs are evolving and therefore some future proofing should be built into the policy in order to ensure that it keeps pace with developments in the industry</p>	See also response to IC009/79. Comment noted. National policy in the National Planning Policy Framework supports economic growth in rural areas in order to create jobs and prosperity. Paragraph 28 of the NPPF sets out what Local Plans need to do to promote a strong rural economy, largely related to business growth and the success of rural communities. Whilst the Local Plan is not required to repeat national policy, further stages of Joint Local Plan preparation will inform Strategic Options and policy approaches for the rural area, where there will be further opportunities for public consultation. We welcome further engagement from the NFU in relation to rural matters.
IC061/442	CJ Harrison	There is nothing in the JLP about: Farming and the rural economy	The importance of the rural economy is



		<p>The economic impact of the University Hospital, a major employer</p>	<p>considered in the Joint Employment Land Review. Agriculture contributes most to the rural economy, although, with the exception of gas and oil, agriculture provides the least number of jobs across the plan area and furthermore future forecasts do not identify agriculture as a key driver for future job growth and instead predict job losses (section 8.28). It would therefore be wrong to overstate the role of agriculture in the borough's economy as a whole. Nevertheless, responsible agriculture is very important to protecting the countryside, delivering improvements to the environment, supplying food and supporting a unique way of life and shaping the borough's identity. In accordance with section 112 of the NPPF local authorities are only required to take into account the economic benefits of the best and most versatile agricultural land, and where significant development of agricultural land is demonstrated to be necessary LPAs should seek to use areas of poorer quality land in preference to that of a higher quality. References to the 'rural economy' do include agriculture and other rural businesses. Evidence on rural economy will inform further stages of Joint Local Plan preparation. We are continuing to liaise with the University Hospital as part of the Joint Local Plan process.</p>
IC076/577	W Naylor	<p>The equestrian sector should be recognised as separate from agriculture in general - it is a job creator in rural and urban margin areas, and creates</p>	<p>See also response to IC061/442. The importance of the rural economy is</p>

		specialised retail and wholesale demand.	acknowledged in the Joint Employment Land Review, although equestrian uses do not feature in the document. References to the 'rural economy' do include agriculture and other rural businesses. Equestrian uses would usually be found in the rural area and would be a sector that the Joint Local Plan would not necessarily allocate specific sites for. National policy in the National Planning Policy Framework supports economic growth in rural areas in order to create jobs and prosperity. Paragraph 28 of the NPPF sets out what Local Plans need to do to promote a strong rural economy, largely related to business growth and the success of rural communities. Farm diversification and reuse of rural buildings would be an issue that the Local Plan could provide a policy approach for. Whilst the Local Plan is not required to repeat national policy, rural economy issues will inform Strategic Options and policy approaches for the rural area.
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**Economy Issue 4: Clustering and Networks of Industry**

Reference	Consultee	Comments	Officer Comments
IC009/71	Councillor Derek R Davies - NDP Steering Group	"Storage and distribution are the economic uses that are likely to require the most amount of land for development in the future" (Issues consultation document, p. 36). This suggests that SoT and NuL plan to maintain their current low-skilled workforce.	The quotation is taken from the key message on page 36 of the consultation document. This key message refers to larger land take that is required by storage and distribution uses, rather than it being the sector with the largest potential for job growth.

			The preceding key message and the preceding explanatory text suggest that there is also likely to be job growth in advanced manufacturing, tourism, retail, leisure, business and professional services and knowledge intensive industries. Storage and distribution industries are therefore likely to contribute part of the overall job growth in the next plan period but there will be an overall mix of skills required from the workforce.
IC013/188	Staffordshire Chamber of Commerce	We agree with the focus on improving transport connectivity and the efficient and effective movement of people, goods and services to support growing firms and maximise the economic potential of the area. It is essential that residential areas are properly connected to employment sites, (3.37), and that alternatives options to use of the private car are available, including walking, cycling and public transport.	Comments Noted. Sustainable connectivity will be a key aspect to be addressed by the Joint Local Plan and will be explored further at the Strategic Options and Draft Local Plan stages.

**Economy Issue 5 Inward Investment**

Reference	Consultee	Consultee Comments	Officer Comments
IC009/70	Councillor Derek R Davies - NDP Steering Group	Skills levels. <input type="checkbox"/> The challenge for the long term is to increase the educational levels of SoT residents so as to provide them with opportunities to remain in SoT and enter higher-skilled jobs and earn higher wages in SoT; and also be able to seek jobs in the NuL area, rather than migrating out at the current high rate. For the shorter term, the challenge for NuL will be to encourage commuting into the borough either by SoT residents (those with the required levels of skill that is) or from outside the NuL borough area; in this scenario the infrastructure will need	Comments noted. The Strategic Options consultation document will begin to explore what strategy may be the most appropriate to tackle the issues that have been identified, including those related to inward investment and workforce skills.

		to have the capacity to support commuting (e.g. using the key routes A34, A50 and A500).	
IC012/172	Keele University	In relation to inward investment (paras 3.38 and 3.39) it is considered that directing economic development targeted towards the most deprived areas of the conurbation is no longer the most appropriate strategy for promoting economic growth. It is likely that most benefits, in terms of direct and indirect employment opportunities and economic multipliers are likely to emerge from supporting growth sectors such as those which are located at Keele University.	Comments indicating support for moving away from the previous plan strategy of targeted regeneration are noted. The Strategic Options consultation document will begin to explore what strategy may be the most appropriate to tackle the issues that have been identified, including those related to inward investment.
IC013/189	Staffordshire Chamber of Commerce	We agree that directing inward investment and economic development to the most deprived areas of the conurbation may no longer be the most appropriate strategy for promoting economic growth. An alternative approach should be investigated to ensure that inward investment enquiries are targeted to the most appropriate locations to meet the needs of the investor and the area, (paras 3.38 - 3.39). We agree with the key challenge on page 38 that the skills of the local workforce need to match the skills requirements of employers and we support the aims of the City Deal. Many local employers are developing their own onsite apprenticeship programmes and facilities that can meet their own future workforce needs, (as well as benefiting other employers), and they need to be encouraged and supported to do so.	Comments indicating support for moving away from the previous plan strategy of targeted regeneration and ensuring that the skills of the local workforce meet the needs of business are noted. The Strategic Options consultation document will begin to explore what strategy may be the most appropriate to tackle the issues that have been identified, including those related to inward investment and workforce skills.
IC024/248	Mr J Poole	Stoke-on-Trent and Newcastle-under-Lyme now both have two established and highly regarded universities, these being Keele University and Staffordshire University. The SHMA highlights a number of young people moving to the area to study, however the evidence suggests that students leave the area after their studies to pursue their careers elsewhere. This provides an indication that there is insufficient high quality employment available in the City to meet the aspirations of graduates from our local universities. The local environment, the availability of a good mix of high quality housing stock and lifestyle offer of the City compared to other urban areas elsewhere in the country may also be factors that influence the decisions of graduates, however it is our opinion that the limited availability of a high quality employment offer is a major factor	Comments supporting a better living environment and employment offer to retain the graduate population are noted. The potential different ways that the new plan strategy can address this issue will be explored at the Strategic Options consultation.
IC025/254	Barratts Developments PLC	Stoke-on-Trent and Newcastle-under-Lyme now both have two established and highly regarded universities, these being Keele University and Staffordshire University. The SHMA highlights a number of young people moving to the area	Comments supporting a better living environment and employment offer to retain the graduate population are

		to study, however the evidence suggests that students leave the area after their studies to pursue their careers elsewhere. This provides an indication that there is insufficient high quality employment available in the City to meet the aspirations of graduates from our local universities. The local environment, the availability of a good mix of high quality housing stock and lifestyle offer of the City compared to other urban areas elsewhere in the country may also be factors that influence the decisions of graduates, however it is our opinion that the limited availability of a high quality employment offer is a major factor	noted. The potential different ways that the new plan strategy can address this issue will be explored at the Strategic Options consultation.
IC025/255	Barratts Developments PLC	It is therefore clear that in addition to improving the housing offer of the City to attract more business leaders and inward investment, as well as provide a mix of housing to attract and retain graduates and younger populations, there is also a need to identify, allocate and prepare a range of suitable and accessible sites to meet modern business requirements. Consideration should also be given to providing allocations and policies to support the provision of small business units to facilitate business start-ups in addition to the allocation of land to facilitate the growth and development of creative industries.	Comments Noted. Site allocations and policies to support small and medium enterprises and creative industries will be explored and identified where appropriate in the Draft Local Plan.
IC038/342	TFK Developments Limited	Stoke-on-Trent and Newcastle-under-Lyme now both have two established and highly regarded universities, these being Keele University and Staffordshire University. The SHMA highlights a number of young people moving to the area to study, however the evidence suggests that students leave the area after their studies to pursue their careers elsewhere. This provides an indication that there is insufficient high quality employment available in the City to meet the aspirations of graduates from our local universities. The local environment, the availability of a good mix of high quality housing stock and lifestyle offer of the City compared to other urban areas elsewhere in the country may also be factors that influence the decisions of graduates; however it is our opinion that the limited availability of a high quality employment offer is a major factor.	Comments supporting a better living environment and employment offer to retain the graduate population are noted. The potential different ways that the new plan strategy can address this issue will be explored at the Strategic Options consultation.
IC047/375	Atherton Family	In economic development terms, the regeneration of the potteries conurbation will rely upon attracting entrepreneurs or wealth creators who will be discerning in their choice of residence. The availability of a housing stock within the middle and upper matrix of the market will often determine their decision as to whether to bring their inward investment to the area or not. We firmly believe the lack of quality housing in the area has severely handicapped the regions regeneration following the demise of its historic industrial foundation. Further development at Baldwin's Gate can help to address that situation.	Similar comment made to the Housing paper. (IC047/375) Support for a greater choice of middle and upper income housing is noted. The potential sites and locations for future housing development will be explored at the Strategic Options stage.
IC061/443	C J Harrison	The JLP should address the poor educational performance of local children and its impact on our failure to attract high value skilled post-industrial businesses to the area.	Comments Noted. Whilst the Joint Local Plan will not be able to directly address educational performance, it

			can support the provision of educational and training facilities to improve the skills of the workforce. Potential opportunities to address this will be explored at the Strategic Options and Draft Plan stages.
IC063/453	Judith Oppenheimer	SoT has failed to reinvent itself following industrial and economic decline. So long as SoT clings to its 'industrial past' it will not make the hard choices that will allow it to pull itself out of its current state of dereliction, move forward and attract new business and new population. In the past, cities that have failed to reinvent themselves in the face of change have suffered terminal decline and eventual desertion. SoT cannot continue to live in the past. It has a choice to move forward into the future or to die.	Comments Noted. The strategy for economic development to be pursued by the Joint Local Plan will begin to be explored at the Strategic Options stage.
IC067/499	Christopher Preece	There is a need to keep factory /workshop space available ready for an upturn in manufacturing of a technical high skilled nature. A system of helping to make business more efficient by designing industrial estates with clear access on roads and loading bays with parking for cars etc. on designated areas not parking on roadways. Example Liverpool new industrial estate on converted Bootle docks area 2012. Also Derby 2011.	Comments Noted. These are matters that will be considered as relevant planning policies are prepared within the Draft Local Plan.
IC070/514	Janet Simpson	Skills mismatch in economy is noted but there is a lack of emphasis on the importance of achieving schools and their role in driving up basic skills needed at the earliest opportunity. It is also evident that when people choose to move to an area for employment they will look at the quality and results of local schools before deciding where to actually live. The Local Authorities (SOT and SCC) and academies need to be strong partners in this aspect to ensure that the area is given the best chance possible of attracting the higher end earners and indeed graduates who may be considering a long term future in North Staffordshire.	Noted - the impact of the Draft Joint Local Plan on school provision will be an integral part of the plan process at the Draft Plan stage.
IC071/543	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	The economy within the Rural South differs dramatically from the traditional Mining and Heavy Engineering that dominated the urban areas of Stoke-on-Trent and Newcastle-under-Lyme. The predominant industry within the Loggerheads Parish area is Farming and Agriculture. Due to the limited amount of job prospects in the Loggerheads area the majority of residents commute to these places of work, with the majority travelling into the urban area. As a consequence, housing developments over the last 30 years have concentrated on family homes and the 1st time buyer has largely been ignored. This is because; developers' profits appear to have dictated the types of house that has been built within the area. In addition, the wholly	The issues raised are significant and do highlight some considerations in regard to the sustainable development of the rural area. In particular the comments highlight the need for balanced housing and economic growth in order to reduce commuting patterns. Further evidence will be required in order to identify the most appropriate housing types and the

		<p>inadequate public transport links, within the Rural South area, has made it impossible for the young to buy in the area as there is a total reliance on the car for transport.</p> <p>The result of this situation is that the population within the Loggerheads area has aged significantly, in recent years, as the young cannot afford to get on the housing ladder in this area.</p> <p>For the future, 3 things must happen if a younger work force is going to consider a move to the Loggerheads area.</p> <ol style="list-style-type: none"> <li>1. Future developments must be predominantly aimed at the 1st time buyer and housing developers must not be allowed to concentrate on the family home.</li> <li>2. Public transport to the rural area must be improved dramatically, to the point where the young can travel to their place of work without incurring ridiculous time penalties.</li> <li>3. Small business should be encouraged to move into the area so that shop assistant and bar staff is not the only jobs available to the young.</li> </ol> <p>Finally, if the economy is to prosper in this area and we are to achieve a more balanced population; the Newcastle-under-Lyme Planning Department must stand firm against the developers' race for profit and insist on a housing balance that has the area's best economic interests at heart.</p>	<p>transport improvements to be delivered in the rural south. As a Neighbourhood Plan is in preparation for Loggerheads then the evidence to support that plan is the most appropriate to draw from.</p> <p>The draft Loggerheads Neighbourhood Plan contains a policy to deliver a mix of homes to include those for first time buyers and the elderly.</p> <p>Comment noted about public transport in rural areas and is also made in the Transport section. This stage of the plan making process is to set out the key issues, challenges and demands on the area, rather than a plan of policies to address them. The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity. Bus services are mostly commercial routes and are operated by private companies.</p> <p>The strategy for economic development, site allocations and policies to support employment land uses will be explored and identified where appropriate in the Draft Local Plan.</p>
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**Employment Technical Paper**

Reference	Consultee	Comments	Officer Comments
IC009/72	Councillor Derek R Davies - NDP Steering Group	<p>To grow the economy and to generate 50,000 new jobs (Stoke on Trent and Staffordshire LEP Strategy) in the next 10 years appears to be unsustainable without inward migration. The local workforce figures in the technical paper seem questionable.</p> <ul style="list-style-type: none"> <li>• Economic growth requiring 50,000 new jobs in 10 years.</li> <li>• Current total residents: SoT 249,000 NuL 124,000.</li> </ul>	<p>The future population figures presented in the comment are a simple projection forward of population growth rates in each local authority area for the next 10 years, which are based on the same rates of growth as those that occurred</p>

		<ul style="list-style-type: none"> <li>• 2011 census shows population growth over previous 10 years to be: Stoke 3.5% (regional average 7.9%) Newcastle 1.5% (regional average 7.9%)</li> <li>• On past trend the calculations for jobs growth are unrealistic: Populations in 10 years' time can be forecast as: Stoke 249,000 + 8,715 Newcastle 124,000 + 1,860 i.e. total population growth = 10,575, leaving a shortfall of 39,425 to make up the increased population of 50,000 needed to fill the forecast new jobs.</li> <li>• This has implications for the numbers proposed in the consultation documents, including consideration whether extra land is required, and acknowledgement that the workforce will need to commute/migrate in order to sustain economic growth on such a level. This in turn has implications for infrastructure beyond SoT and NuL, including transport.</li> </ul>	<p>in each area over the 10 year period between the Census 2001 and the Census 2011. The national Planning Practice Guidance (PPG) does not advocate this approach and instead states that the Government's household projections are the starting point for assessing future housing needs but that these need to be tested against other local factors such as house prices, affordability of housing, overcrowding and past rates of development.</p> <p>The approach to calculating housing and employment needs in both the Joint SHMA and Joint Employment Land Review follow the methodology set out within the PPG and this is explained in the Issues Consultation Document and the supporting Housing and Economic Technical Papers.</p> <p>The councils therefore do not support the alternative calculation of future population growth that is presented in the comment.</p> <p>The 50,000 new jobs figure is referenced from the LEP's Strategic Economic Plan. This relates to the whole of the Stoke and Staffordshire area in the period 2014 to 2030, whereas the Joint Local Plan will cover only Newcastle-under-Lyme and Stoke-on-Trent over the period 2013 to 2033. The Joint Local Plan will contribute towards the 50,000 new jobs figure but</p>
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			only a proportion of these will be delivered in the plan area over the next plan period. The actual amount of new jobs and homes to be delivered by the Joint Local Plan will begin to be narrowed down at the Strategic Options stage.
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## Schedule of Comments – City, Town and Other Centres

General Issues Comments – City, Town and Other Centres			
Reference	Consultee Name	Comments	Officer Comments
IC011/148	Thistleberry Residents Association	Re 4.10 It is important to also look at the activities that go on within buildings and the infrastructure and the hinterland which supports these activities, not just the buildings themselves. Unless everything dove tails then a town is unlikely to succeed. Shop keepers should not be the only engineers of a town or have the only say in the way that it is run/organised. We would like to see the results of these retail studies which are said to have been undertaken	Existing retail studies for both authorities are available on the council's website. Retail study updates will be undertaken during 2017/18 and any updates will be published on the council's websites on the Joint Local Plan Evidence webpages.
IC011/154	Thistleberry Residents Association	Overall, the rhetoric in this section is somewhat woolly and lacks any real definition which could make some of it a reality. Identity is not something that can be imposed. It is something that grows with time and buildings have a definite role to play in this. This is why new buildings should not only be carefully chosen but also old buildings should be carefully preserved and used if at all possible. Developers should not be allowed to randomly remove and erase identity from a locality by imposing their own vision, wantonly, on an area. Most of the villages around Newcastle and Stoke came into being as a result of industrial activity be it agricultural or industrial. As these industries declined many have become commuter villages with no real purpose other than residential, although some are realising their potential for commercial activity. This should be both encouraged and developed	Noted
IC019/218	Realis	The Councils should undertake an assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for main town centre uses (office, leisure, retail etc). The NPPF threshold of 2,500 sq m is too high, particularly in areas where town centres are vulnerable and even a small out of centre scheme could have a disproportionate effect on vitality and viability of the centre. Our experience of the NPPF threshold is that developers of out of centre proposals increasingly size a scheme just under the NPPF threshold on the basis of there not being a unit available within a town centre location that meets all of the operational requirements of an occupier. This then allows them to circumvent the requirement to assess the proposals against the impact test - the NPPF is clear that this is only required over the	A locally set threshold over which impact assessments will be required for main town centres uses should be set out in the Joint Local Plan. Evidence for this is set out within the WYG Retail and Leisure Study (2014).

		nationally set threshold or where a locally set threshold, based on robust evidence, is set. We would therefore strongly recommend that research led by the joint authorities is undertaken to assess where the current balance of unit sizes lies in each of the city, town, district and local centres. A suitable threshold or thresholds can then be set which supports the spatial strategy of the Plan.	
IC019	Realis	<p>Having reviewed the Joint Local Plan Issues document Realis is broadly supportive of the direction the Joint Local Plan authorities propose, but await clarification on the approach to hierarchy of centres, definitions of the role and function of defined centres and, to that end, specific policies relating to town and district centres.</p> <p>The council should update the Retail Study as a matter of urgency in order to identify quantitative and qualitative retail and leisure needs as informed by a new shopper survey. Work should also be undertaken on developing deliverable town centre strategies that focus on addressing the structural changes of the centres (where these are apparent). The resultant strategies should be included within the emerging plan.</p> <p>On behalf our client, we request that we are kept up to date on the progress of the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan.</p>	Retail study updates will be undertaken during 2017/18 which will help to inform town centre strategies to feed into the Joint Local Plan.
ICO21/223	Intu Properties	Intu is certain that Stoke-on-Trent City Council will fully support its development aspirations for the City Centre. The Joint Local Plan must provide a positive context for the future investment in the City Centre and also provide greater certainty that its planned investment will not be undermined by inappropriate development elsewhere including in less sequentially preferable locations.	Noted. The Joint Local Plan will provide a positive vision and objectives for the Joint Local Plan area. Stoke-on-Trent City Centre is a key part of that vision.
IC021/224	Intu Properties	<p>Para 4.6 of the Joint Local Plan recognises the City Centre as being: ‘...the largest retail destination in North Staffordshire and South Cheshire, fulfilling an extremely important retail destination as well as cultural and leisure offer’.</p> <p>Para 4.17 of the Joint Local Plan continues that the City Centre is ‘...the leading retail centre in the region’.</p> <p>A primary aim for the Joint Local Plan is to ensure the future vitality, viability and vibrancy of the City Centre alongside town, urban and village centres within the two authority areas.</p> <p>Intu welcomes the recognition of the City Centre as an extremely important destination for retail, leisure and cultural uses and as the leading retail centre in the region. Accordingly Intu considers that it is essential that the Joint Local</p>	Noted

		Plan is used to plan positively for the future development needs of the City Centre, so that it can maintain and enhance its position in the future. As set out below, this should include positively providing for further development and regeneration around The Potteries.	
ICO34/314	Historic England	Para 4.3 – This paragraph emphasises the importance of heritage in terms of local identity and distinctiveness, and is welcomed.	Noted
IC065/484	Maggie Taylor (Sport England)	The role of City Centres or main town centres in sports leisure provision does not appear to be addressed in this section? Stoke City Council, as part of the Built Sports Facility Strategy, is looking at need to and locational factors affecting the desire to provide a regionally significant sports venue to put the City on the map as a sports competition venue for the region - what criteria would/should the local plan include to steer the location of such facilities?	Stoke-on-Trent City Council are producing a built facilities strategy which, once completed and approved, will form evidence for the Joint Local Plan at the draft plan stage. Sports and leisure facilities are an important part of the plan in terms of health and community facilities.

Issue 1: Retail Hierarchy			
Reference	Consultee Name	Comments	Officer Comments
IC005/27	St Modwen	<p>The use of a retail hierarchy is recommended and consistent with the NPPF. The centres included within the hierarchy and the accompanying City, Town and Other Centres Technical Paper appears to include all of the centres within the two districts.</p> <p>5.2 At present the boundaries of the centres are not clearly defined due to the scale of the map. It is recommended that the importance of the Festival Retail Park is recognised by allocating it as a local centre, including the land at Cobridge Road which could also provide a retail function. Currently this land contains a vacant public house and petrol filling station (last used for car sales). The potential of retail redevelopment of this site would provide significant benefit to the area and it should be secured through allocation, along with Festival Retail Park as a Significant or Local Urban Centre. Further, the NPPF requires LPAs to define the extent of town centres, primary shopping areas and primary and secondary frontages. This exercise does not appear to have been fully undertaken.</p>	The boundaries of the centres and Local Centres will be set out at the Draft Plan stage, taking evidence/advice from the WYG Retail and Leisure study and any further updated evidence. The consideration of Festival Park as a Local centre is not one that has been currently considered and is not consistent with the classification of 'local centre' in providing daily convenience goods. However it is recognised as an out-of-town retail destination and further consideration will be given to the role of Festival Park as a retail destination at the draft plan stage, following

			consultation on strategic options.
IC009/98	Councillor Derek R Davies - NDP Steering Group	SoT needs to decide whether it wants to be the city of Stoke-on-Trent or the Six Towns. If the Six Towns, <ul style="list-style-type: none"> <li>· a distinctive local identity, cultural offer and economy needs to be developed in each town</li> <li>· quality historic buildings need to be selected that genuinely contribute to the local environment of each centre and need to be re-invented as prestige business, residential and leisure locations</li> <li>· each town must have first-rate public transport links to the main cultural and economic centre in Hanley</li> <li>· each town must have first-rate public transport links to the railway station so as to enable access to the main regional cultural, leisure and shopping centres in Birmingham, Manchester and Liverpool</li> </ul>	Noted
IC009/99	Councillor Derek R Davies - NDP Steering Group	While NuL still has a street market, it has lost its identity as a market town since the closing of its livestock market. A succession of poor planning decisions from the late 1960s onwards have resulted in the as-yet unhalted decline of the town centre. The tackiness of the town centre, its shop fronts and poor-quality developments such as 1 London Road detract seriously from the aspect of a once-prosperous town centre. Appearances make it difficult to believe that the town centre is actually a conservation area. NuL could be attractive and prosperous again. NuL needs to look carefully at its architectural, cultural and historical heritage. Like SoT, it needs to distinguish between legacy and heritage. Eyesores such as the Zanzibar need to be demolished. A number one priority for NuL should be to put its heritage to work in the town centre. NuL needs to create heritage 'corridors' linking the town centre to heritage, cultural, conservation and residential areas that lie outside the ring road; to complement its heritage areas with attractive outdoor spaces; and to mitigate the blighting impact of the ring road on both the town centre and the areas immediately beyond it. As in the case of SoT, population could be attracted to town-centre living if the historic, cultural, leisure and shopping facilities were right. Like the Six Towns, NuL needs first-rate public transport links to the main cultural and economic centre in Hanley and to the railway station.	Newcastle is still an active market town despite the loss of its livestock market. Newcastle's market town heritage remains an important part of the town's identity. The authorities have a duty to protect both designated and non-designated heritage assets, but places evolve over time and consumer habits change. The programme of conservation area appraisals and management plans managed by both authorities is central to this as well as the records kept in respect of buildings of local historical and architectural interest. The evidence base for the Joint Local Plan will be supported by the Stoke and Newcastle Design Guide SPD, Newcastle-under-Lyme Town Centre SPD, and Shopfront Design Planning Practice Guidance Note; along with Conservation Area.
IC011/149	Thistleberry Residents Association	The hierarchy of towns and centres is an interesting section. It is noted that Newcastle and Stoke are listed as strategic centres. Are they regarded as equal partners in this hierarchy or is Stoke the lead partner and what does	In the existing Core Spatial Strategy both Newcastle-under-Lyme and the City of Stoke-on-Trent are defined as

		<p>this partnership amount to? We are told what the current hierarchy might be and that it needs to change but what will that change be as a result of this Plan? The changes are not identified so how can people agree or disagree with them and don't residents need a say at this stage of the reformulation – and not after it has been decided?</p>	<p>Strategic Centres in the Retail Hierarchy. The policy goes on to define other Centres and Villages within which particular retail policies would apply. Any policy approach that refers to Strategic Centres would apply equally to both locations unless otherwise stated. The Hierarchy of centres will be set out at the Draft Plan Stage with an opportunity to comment on the draft hierarchy. The proposed hierarchy will have regard to up to date evidence within the Retail and Leisure studies for the areas.</p>
IC011/151	Thistleberry Residents Association	<p>Newcastle should not lose its identity as a market town. Particularly as it has ignored the possibility of it becoming a University town as well – until recently. There is also room for Stoke to have a double identity. How this is affected needs careful planning and consideration. Retail in Newcastle – apart from bars and fast food outlets have hardly touched the commercial potential of Newcastle being a university town, and getting rid of the cattle market and other commercial ventures associated with farming appears to have diminished the identity of Newcastle as a market town. Are local restaurants/food outlets supplied by local farms for instance? Is there a local farmers' union shop in the town? How is Stoke's industrial heritage being commercialised? The success of the College shop in town to sell the art and craft work of students is noted and would be a good model to begin with – although it is still somewhat parochial.</p>	<p>Comment noted. Newcastle's market town heritage remains an important part of the town's identity. The Core Spatial Strategy defines Newcastle Town Centre as a strategic centre, a primary focus for major retail development, uses which attract large numbers of people, large scale leisure and office development. The Joint Local Plan Issues Consultation Document acknowledges that centres represent the image of a place both to the outside world and local communities. A high quality, well designed environment is therefore essential to the success of individual centres and the performance of the plan area as a whole. The Hierarchy of centres will be set out at the Draft Plan Stage with an opportunity to comment on the draft hierarchy. The proposed hierarchy will have regard to up to date evidence within the Retail and Leisure studies for the areas.</p>

IC012/173	Keele University	It is acknowledged that the retail hierarchy needs to be reviewed to take account of prevailing economic and retail circumstances. Consideration should be given to the need to provide an appropriate level of retail provision within major employment areas and also within the main University campus locations. Limited facilities are already available at Keele but there is scope for some enhancement of existing provision as employment levels increase. Such provision would also serve the needs of the local residential community.	Noted
IC013/190	Staffordshire Chamber of Commerce	We agree that the retail hierarchy needs to be reviewed to take account of prevailing economic and retail circumstances. The review should not be in terms of its structure but in terms of the quantum of floor space and the range of facilities directed to each level in the hierarchy. The local economy requires a strong, vibrant and successful city centre able to fulfil its role as a regional retail and leisure destination. Local towns should be developed to fulfil appropriate niche roles.	Noted
IC019/216	Realis	Paragraph 4.13 of the consultation document states that there is an intention to re-evaluate the existing retail hierarchy set out within the adopted Core Spatial Strategy. This approach should reflect the size, current role and status of the centres within the context of both the authority and wider sub-region. The need to attract investment and focus development within Stoke-on-Trent City Centre should be recognised through the Joint Local Plan by placing it at the top of the retail hierarchy as the sole and principal location for large scale retail development. Lower order centres should seek smaller scale improvements that respect their size and function. Any new policy should therefore be clear that scale will be integral to decisions on proposals for new town centre uses and that this will be assessed in relation to the town centre hierarchy. The redevelopment of the East West Centre is essential to the wider regeneration of Stoke City Centre and therefore the Council must ensure that policies contained within the Joint Local Plan do not undermine investor confidence and harm its vitality and viability. New development must therefore be of an appropriate type, scale and form for its location. Identifying Stoke-on-Trent City Centre at the top of the hierarchy will allow for clear differentiation between the other centres and ensure that its role as a sub-regional centre is protected.	Noted
IC022/234	Joan Walley	The Housing section needs to be linked to a policy which connects people to local centres, transport hubs and employment opportunities. In this context I suggest that the Plan reconsiders its approach to how the urban and rural	The plan will integrate the aspects of social, economic and environmental planning by ensuring that the policies

		<p>areas better connect to the city centre in Hanley and the ten centre in Newcastle under Lyme. For example there is very scant reference to the ongoing work in respect of the Burslem Master Plan. While I agree that Hanley is the main centre city centre, there needs to be much more detailed work done on how each of the remaining 5 towns of Stoke on Trent relate to their local population so that the natural historic organic growth across the city centre can continue recognising the value of local neighbourhoods, retail, open space, facilities and transport. At the very least I would like to see input from the Burslem Regeneration Trust into the various technical papers and proposals which relate to Burslem so that the valuable regeneration led THI work can be extended.</p>	<p>deliver sustainable development. In respect to Burslem centre the Hierarchy of centres will be set out at the Draft Plan Stage with an opportunity to comment on the draft hierarchy. The proposed hierarchy will have regard to up to date evidence within the Retail and Leisure studies for the areas including detailed health assessments on each centre.</p>
IC057/423	Paul Baddeley	<p>Need to have a larger focused centre of the conurbation (City Centre) in Hanley, to provide the things local people want and attract more people from the surrounding area.</p>	<p>The City Centre is identified within the existing retail hierarchy as the largest centre within the plan area and as such the scale of any new development will reflect the scale, role and function of the centre going forward and reflect the amount of new development required to meet the vision, aims and objectives of the plan.</p>
IC061/444	C J Harrison	<p>Whilst housing policy is likely to be the most controversial, the bigger issue for the City and Borough is the rejuvenation of town centres. The centres of the City's six towns should be seen as a potential selling point for both residents and potential commercial and industrial investors. Each City town centre needs its own rejuvenation policy, as does Kidsgrove and Newcastle.</p>	<p>Noted</p>
IC063/456	Judith Oppenheimer	<p>SoT needs to decide whether it wants to be the city of Stoke-on-Trent or the Six Towns. If the Six Towns,</p> <ul style="list-style-type: none"> <li>· a distinctive local identity, cultural offer and economy needs to be developed in each town</li> <li>· quality historic buildings need to be selected that genuinely contribute to the local environment of each centre and need to be re-invented as prestige business, residential and leisure locations</li> <li>· each town must have first-rate public transport links to the main cultural and economic centre in Hanley</li> <li>· each town must have first-rate public transport links to the railway station so as to enable access to the main regional cultural, leisure and shopping centres in Birmingham, Manchester and Liverpool.</li> </ul>	<p>Noted</p>
IC063/457	Judith	<p>While NuL still has a street market, it has lost its identity as a market town</p>	<p>Newcastle is still an active market town</p>



	Oppenheimer	<p>since the closing of its livestock market. A succession of poor planning decisions from the late 1960s onwards have resulted in the as-yet unhalted decline of the town centre. The tackiness of the town centre, its shop fronts and poor-quality developments such as 1 London Road detract seriously from the aspect of a once-prosperous town centre.</p> <p>Appearances make it difficult to believe that the town centre is actually a conservation area.</p> <p>NuL could be attractive and prosperous again. NuL needs to look carefully at its architectural, cultural and historical heritage. Like SoT, it needs to distinguish between legacy and heritage. Eyesores such as the Zanzibar need to be demolished.</p>	<p>despite the loss of its livestock market. Newcastle's market town heritage remains an important part of the town's identity. The authorities have a duty to protect both designated and non-designated heritage assets, but places evolve over time and consumer habits change. The programme of conservation area appraisals and management plans managed by both authorities is central to this as well as the records kept in respect of buildings of local historical and architectural interest. The evidence base for the Joint Local Plan will be supported by the Stoke and Newcastle Design Guide SPD, Newcastle-under-Lyme Town Centre SPD, and Shopfront Design Planning Practice Guidance Note; along with Conservation Area.</p>
IC072/560	Dean Lewis (Tim Dean)	<p>Dean Lewis Estates welcomes the approach of reviewing the current hierarchy of centres set out within the adopted Core Spatial Strategy. A new distinctive and sustainable settlement hierarchy, whilst still respecting the areas special historic character, will help to ensure that new housing and businesses strengthen the role of centres and support their economic sustainability.</p> <p>4.6.6 With particular regard to the three Rural Service centres designated within the Core Spatial Strategy within Newcastle-Under-Lyme, Audley Parish, Madeley and Loggerheads, it is welcomed that their existing status is recognised as potential growth locations. These Rural Service Centres within Newcastle-Under-Lyme provide "the most comprehensive range of essential rural services".</p>	Noted
IC077/588	Andy Perkin (Potteries Heritage Society)	The hierarchy of centres is justified for planning purposes. However, in the diagram under Retail Hierarchy (4.12) the top section (Strategic Centres) should read "The City Centre of Stoke-on-Trent & Newcastle-under-Lyme Town Centre"	Wording change to the retail hierarchy Strategic centres are - The City Centre of Stoke-on-Trent & Newcastle-under-Lyme Town Centre
IC079/603	Andy Perkin (on behalf of) Stoke	The hierarchy of centres is justified for planning purposes. However, in the diagram under Retail Hierarchy (4.12) the top section (Strategic Centres)	Wording change to the retail hierarchy Strategic centres are - The City Centre

	Neighbourhood Forum	should read "The City Centre of Stoke-on-Trent & Newcastle-under-Lyme Town Centre"	of Stoke-on-Trent & Newcastle-under-Lyme Town Centre
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<b>Issue 2 Vitality, Viability and Vibrancy of Centres</b>			
<b>Reference</b>	<b>Consultee</b>	<b>Comments</b>	<b>Officer Comments</b>
IC009/97	Councillor Derek R Davies - NDP Steering Group	Families with children want to live in urban and central locations so as to be close to facilities that families need the most – shopping, education and leisure and cultural facilities. European studies have found that higher-income professional families are attracted to live in historic urban areas, including the most central locations, on the basis of the historic offer and high-quality leisure and shopping and cultural facilities. The same studies have found that people in the creative industries are also attracted to town-centre living in historic urban areas on the basis of the historic, cultural, social and business networking offers. SoT has a strong creative make-up based on the output of the local art schools and Staffordshire University's film school and needs to look seriously at making itself attractive to young creative professionals.	Noted
IC011/144	Thistleberry Residents Association	4.20 states that office development has moved out of the town centres. Is this as a result of people working from home? If it is moving to rural sites then it could be considered that old farm buildings could be used for this purpose as has happened at Keele. The existence of Keele tends to skew the data for Newcastle. Even so, isn't it the purpose of the Planning System to regulate where development goes? This is what development plans are for?	The following paragraph (4.21) gives a reason for office development moving to out of centre locations, such as accommodation in centres not being fit for purpose and needs of modern office-based businesses. Planning Policy Teams monitor the completion of retail and office development schemes as planning permissions are built out. As part of this process we record whether this is in-centre or out-of centre. There are many reasons for planning permission to be given to retail or office locations out of centre however an assessment of the capability of being accommodated in centre is required as part of the planning application process and the council advocates centres first

			approach. The conversion of buildings in rural areas for employment uses is encouraged through the national planning policy framework and could be further considered at a more local level through the joint local plan
IC011/152	Thistleberry Residents Association	4.22 appears to regret the existence of out of town centres – again isn't this what the planning system is for? Perhaps the planners should look at the Trentham and Etruria out of town shopping centres and work out why they are successful and always very crowded and well patronised. 4.23 these are high sounding words but if they are rarely brought into commission and realised they are empty rhetoric.	Noted
IC011/153	Thistleberry Residents Association	Perhaps there needs to be a total rethink of what goes on in town centres to attract visitors and residents. Fun fairs and circuses are not the only entertainment that people want. This section also now admits that Newcastle is part of the Stoke-on-Trent conurbation. Is this a fact or an aspirational goal? 20. 4.25 states that a strategic macro and micro approach to planning is necessary. It sounds as if this hasn't been tried before. High quality centres require investment of all kinds and it is not just about money. This section suggests that a joined up approach is needed and would be necessary to bring about change. This approach was discussed two decades ago has it never been implemented?	Noted. This Joint Local Plan is a further opportunity for two Councils to work together in partnership, a partnership created as a result of adopting the Joint Core Spatial Strategy in 2009. Retail study updates will be undertaken during 2017/18 which will help to inform town centre strategies to feed into the Joint Local Plan.
IC019/216	Realis	Paragraph 4.19 recommends a review of existing town centre boundaries and the introduction of Primary Shopping Areas (PSA) in order to direct future retail development. Furthermore, the WYG Retail and Leisure Study (2014) identified a proposed future expansion area to the south of the PSA to take in the site of the former City Central development. Realis strongly support the inclusion of this site within the PSA as a revised scheme for this area is progressing towards submission. This will enable the proposed redevelopment scheme to take on an anchor role at the southern extent of the PSA and contribute to a significant improvement to the vitality and viability of the City Centre. This will help facilitate the redevelopment of a large vacant strategic site within the city centre and ensure such investment is afforded continued protection in the face of competition from several large out-of-centre retail and leisure parks. To accord with national policy, the Joint Local Plan should also include a plan for each of the designated centres that clearly identifies primary and	Noted - Retail study updates will be undertaken during 2017/18 which will help to inform town centre strategies to feed into the Joint Local Plan. This will include defining centre boundaries and Primary Shopping Areas

		<p>secondary shopping frontages. This is referenced at Bullet 3 of NPPF Paragraph 23 requires Local Plan policy to: “define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.” A number of recent local plans have failed to grapple sufficiently with this issue causing delays to their adoption.</p> <p>The principle of maintaining a focus on A1 retail floorspace within defined centres is supported by Realis. The promotion of a mix of uses within defined centres at paragraphs 4.16 to 4.19 of the Issues document is also welcomed. Whilst the Council should seek to manage the loss of A1 retail floorspace within the Primary Shopping Area, the wording of any policy should not be overly restrictive and ignore national guidance on the need to adopt a flexible approach to the future role of town centres. This approach is set out by the NPPF at paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide for customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable ‘main town centre uses’ as retail, leisure, entertainment facilities, which includes restaurants and bars, and offices. This recognises that retail forms only one part of the experience for visitors to a town centre; it is equally about gaining access to people driven services, eating out, meeting with friends and having an opportunity to socialise. Accordingly, the emerging Local Plan should recognise that customers expect more from their shopping experiences and there is pressure on shopping centre owners, managers and tenants to respond to this. The NPPF also attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy expectations and that centres should be resilient to anticipated future economic changes. The ability to undertake a balanced consideration of complementary town centre uses at the time they are proposed, where this does not undermine the predominance of A1 retail, is the preferred approach of the NPPF to securing the vitality and viability of town centres.</p>	
IC021/225	Intu Properties	<p>Para 4.19 of the Joint Local Plan refers to the Stoke-on-Trent Retail Study (2014) and the recommendation that a review of existing TCBS be undertaken and a PSA be identified in the City Centre, in order to direct the course of future retail development. This is a continuation of Joint Core Strategy (2009) Policy ASP1.</p>	<p>The City Centre Primary Shopping Area is described within Policy ASP1 of the adopted Core Spatial Strategy, however it is noted that more up to date retail evidence will be used to</p>

	<p>The City Centre currently has a TCB, as set out in the Local Development Framework Proposals Map, but no PSA. The City Plan (1993) Proposals Map refers to a main shopping frontage in the City Centre, which covers a small area immediately south of The Potteries shopping centre. Both the Core Spatial Strategy Policy ASP1: City Centre of Stoke-on-Trent Area Spatial Policy (as set out above) and the Stoke-on-Trent Retail Study (2014) make recommendations as to the potential extent of a PSA within the City Centre and the Local Plan is seeking to translate this into Development Plan policy.</p> <p>Para 23 of the NPPF sets out that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, LPAs should, amongst other things (criterion 1 of 3): define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations. Intu considers it important that any PSA defined for the City Centre reflects the existing core retail area, including The Potteries and those streets that immediately surround it. It is not the purpose of Development Plan policy to speculate on what might be reasonably considered part of the PSA at some future point in time.</p> <p>Intu notes that Para 10.28 of the Stoke-on-Trent Retail and Leisure Study (2014) recommends that the TCB be extended to encompass the Tesco Extra on Clough Street and the Sainsbury's at Etruria Road. Intu considers that there is no sound planning justification for inclusion of sites at Clough Street and Etruria Road within a revised TCB, based upon the existing characteristics of these sites, which are clearly separate retail areas from the City Centre. Furthermore Intu does not consider that these sites will merit inclusion in the future as there are several centrally located sites which are able to meet future retail needs (including the Intu site around Brewery Street and Bryan Street) and render any extension to Clough Street and Etruria Road unnecessary.</p> <p>The purpose of defining a revised TCB and establishing a PSA must be the objective of concentrating future development of main town centre uses (to meet the needs identified) into the central-most areas of the City Centre in order to focus activity in the most accessible locations. The inclusion of what we consider to be peripheral and very large sites dominated by substantial retail warehouse 'sheds' surrounded by car parking into a TCB would serve</p>	<p>review the existing primary shopping area and city centre boundary in order to inform the new Joint Local Plan. Comments are noted regarding the evidence required to demonstrate any boundary review and whilst set out within the WYG study these are set out as recommendations to the Local Planning Authority and any change, if taken forward, would need to be set out and justified through the Joint Local Plan process. Such a decision will be set out at the Draft Local Plan stage and public consultation carried out.</p>
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		to dilute such a concentration of activity and undermine the objectives that Stoke-on-Trent City Council and its partners have for the City Centre. The emphasis should be on improving linkages between the City Centre and these peripheral sites whilst focusing upon encouraging development within the core area of the City Centre	
IC021/226	Intu Properties	<p>Para 4.20 of the Joint Local Plan refers to Stoke-on-Trent monitoring data which shows evidence of significant levels of out-of-centre retail and office development since 2004 (out-of-centre retail completions totalling 43,273 sq. m and office floorspace completions 33,007 sq. m). This is considered to be a key issue; with out-of-centre development having a significant impact on townscape character and quality and that this undermines the image of the City Centre. The Joint Local Plan considers that there is a need to ensure that out-of-centre development does not weaken the identity and positive character of existing centres.</p> <p>Intu considers that the out-of-centre retail development that has been permitted by the Council has played a significant part in the decline in the vitality and viability of the City Centre and further development in such locations has the potential to have an adverse impact inconsistent with the town centre first approach as set out by the NPPF [Paras 24 and 26]. Intu considers that Local Plan policy should reflect Government guidance (NPPF and Practice Guidance) regarding a town centre first approach. As described above, Para 23 of the NPPF sets out that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, Para 23 is clear that LPAs should, amongst other things, allocate a range of suitable sites to meet the scale and type of main town centre uses needed in town centres. Intu considers that there are centrally located sites, which are sequential, preferable to peripheral quasi-retail corridors beyond the core retail area, which are available for development. This includes the area around Brewery Street and Bryan Street. As such, no further out-of-centre development is likely to be required or justified. The Joint Local Plan provides an opportunity to plan positively whilst adopting a town centre first approach and assisting the long term vitality and viability of the City Centre.</p>	Noted - policies reflecting a centres first approach will be considered as part of the Draft Local Plan. It is also important to ensure that allocations reflect retail need and again will be undertaken on a centre by centre approach. Retail study updates will be undertaken during 2017/18 which will help to inform town centre strategies to feed into the Joint Local Plan.
IC021/227	Intu Properties	Para 4.16 refers to the idea that a wide range of uses can be beneficial to centres in order to generate activity and footfall. As a result, many centres are now looking to offer a wider range of uses to remain attractive to residents and visitors in order to ensure that footfall and consumer spending	Noted

		can be sustained. Accordingly, a key issue is that 'centres need to increase their range of uses and not depend on retail as predominant land use'. Intu supports this approach which reflects its own experience across the UK and in its recent investment in The Hive. It is important to point out in this respect that the future of shopping is intrinsically linked with the provision of a wider range of uses and experiences in town and city centres and this must be reflected in the Joint Local Plan.	
IC022/239	Joan Walley	I would like to see far more consultation on the section six relating to the Town centres. The retail studies present a very simplified version of changes in retail patterns and behaviour, and there is the assumption that future planning decisions should be based on shopping rather than on access to local schools, viable neighbourhoods etc.	Noted - Further consultation on the spatial options and Draft Local Plan will be undertaken during 2017 / 18 as well as further information on updated retail and leisure studies for Stoke-on-Trent and Newcastle-under-Lyme
IC028/278	Henry Davidson Developments	Para 4.16 recognises that a wide range of uses can be beneficial to centres in order to generate activity and footfall. As a result, many centres are now looking to offer a wider range of uses to remain attractive to residents and visitors, in order to ensure that footfall and consumer spending can be sustained. Accordingly, a key issue is that: 'centres need to increase their range of uses and not depend on retail as the predominant land use'. HDD supports this approach of encouraging a broad range of main town centre uses within the town centre, which provides the scope to develop sites in line with current market signals and help to ensure the vitality and viability of the town centre is maintained and that vacant units/floorspace are kept to a minimum. This should be supported through emerging policies of the Joint Local Plan. HDD considers that this approach will help to maintain the quality and improve the offer of the town centre. Positive planning policies towards diversity of uses within the town centre can assist in increasing levels of footfall within the town centre and, over the long term, ensure that the town centre remains competitive and its position of significance in the sub-region is maintained. Ryecroft should be identified as a site that is appropriate for a broad range of uses (including main town centre uses), to provide support for a development that will increase the offer and diversity within the town centre.	Comment noted and support welcomed. Ensuring the vitality and resilience of town centres accords with National Planning Policy. Specific sites and the role town centres will be considered at future stages of the Joint Local Plan.
IC028/279	Henry Davidson Developments	As set out in the 'key messages' which follow Paras 4.20-4.22 of the emerging Joint Local Plan, HDD consider that out-of-centre development is a key issue which will need to be addressed within subsequent iterations of the plan. HDD agrees that there is a need to ensure that out-of-centre	Noted - policies reflecting a centres first approach will be considered as part of the Draft Local Plan. It is also important to ensure that allocations

		<p>development does not weaken the identity and positive character of existing centres.</p> <p>HDD considers that Local Plan policy should reflect Government policy and guidance (NPPF and National Practice Guidance) regarding a town centre first approach – including assessing the impact which development proposals in less central locations could have on investment proposed within town centres. This is appropriate to protect the vitality and viability of the defined centres within the region, including both the short and long term future of the town centre which HDD is committed to making significant investment in.</p> <p>HDD considers that having an NPPF compliant policy for assessing retail proposals will provide the basis to making appropriate decisions in respect of edge and out-of-centre retail development.</p>	<p>reflect retail need and again will be undertaken on a centre by centre approach. Retail study updates will be undertaken during 2017/18 which will help to inform town centre strategies to feed into the Joint Local Plan.</p>
IC034/315	Historic England	<p>Issue 2: Vitality, Viability and Vibrancy of Centres – The three sections of key challenges relating to this issue are welcomed. The plan evidence base will need to acknowledge these aspects in relation to the historic environment and heritage assets to ensure they are protected, conserved and enhanced.</p>	Noted
IC050/396	SOTCC Regeneration & Development Team	<p>A new approach to growth in Stoke-on-Trent is needed that brings a rapid increase in high quality homes and employment locations in the city, bringing with it a footfall and spend that can contribute to sustainable town centres.</p>	Noted
IC076/580	W Naylor	<p>Trentham Retail - It's a golden goose and deserves to be lauded and admired for giving people what they want - with no parking charges.</p>	Noted
IC077/589	Andy Perkin (Potteries Heritage Society)	<p>A key message after 4.19 that states "Centres need to increase their range of issues and not depend on retail as predominant land use" is one that the Society can wholeheartedly support, but this is not followed up by a key challenge or any thinking on how this might be achieved through planning policy.</p>	Noted - policies for town centres will be set out in the Draft Joint Local Plan in 2017

### Issue 3: Potential for Future Development

Reference	Consultee	Comments	Officer Comments
IC005/28	St Modwen	<p>The Consultation Document acknowledges at this point that there would be a shortfall in retail provision within Stoke-on-Trent based on the Retail and Leisure Study 2014. As mentioned above, there is an opportunity to enhance the existing retail provision at Festival Retail Park through the</p>	<p>Noted - policies and site allocations will be set out at in the Draft Joint Local Plan in 2017</p>



		<p>redevelopment of land at Cobridge Road. The NPPF encourages (paragraph 23) allocating a range of suitable sites to meet the scale and type of retail and leisure development needed. It is recommended that in accordance with this, and in the face of a shortfall of retail space currently available, the land at Cobridge Road is allocated for retail and leisure uses.</p> <p>5.4 The City, Town and Other Centres Technical Paper, table 14 on page 23 identifies one of the weaknesses of Stoke City Centre is a lack of convenience provision. The site at Cobridge Road, linking the current City Centre with the Festival Retail Park, could provide a small, convenience led retail scheme to help meet this identified shortfall. It is therefore recommended that the City Centre boundary is extended to include the land at Cobridge Road</p>	
IC011/150	Thistleberry Residents Association	<p>4.28 Notes the decline in need of inner town office space over the last 10 years – from 43273 sq metres to 33007 sq metres. Perhaps the reasons for this should be more carefully investigated before new office space is created in town centres which might never be used.</p>	<p>Noted. Paragraph 4.28 explains data about retail floor space, not offices. The figures quoted relate to Stoke-on-Trent's out of centre retail and office completions since 2004 (4.20). Office and retail development should be planned for by evidence of up to date needs and market assessments in order for the Joint Local Plan to Plan for appropriate scales and types of development.</p>
IC019/217	Realis	<p>In order to respond effectively to the strategic issues which are identified the Council will need to undertake an update of its evidence base. The Council acknowledge this at paragraph 4.11 of the consultation document and this is welcomed.</p> <p>Guidance on the preparation of the evidence base to underpin the strategy and development management policies of Local Plans is set out within the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). Paragraph 158 of the NPPF states:</p> <p>“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”</p> <p>The PPG expands on the above, setting out that evidence needs to inform</p>	<p>Noted. Office and retail development should be planned for by evidence including up to date needs and market assessments in order for the Joint Local Plan to Plan for appropriate scales and types of development.</p>

		<p>what is in the plan and should also be kept up-to-date. Moreover, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage) (PPG: Paragraph 014 Reference ID: 12-014-20140306).</p> <p>Any revision to the retail evidence base should include an updated household survey. This should not just seek to roll forward capacity figures to set the quantum of floorspace that development management policies will need to accommodate. The requirement for a significant increase in new housing and economic growth will necessarily form the backdrop to assessing both quantitative capacity but also the qualitative need for further retailing within Stoke-on-Trent. The Plan must therefore provide a clear strategy as to where and when any further retail development will be accommodated to ensure that the town centres first approach of the National Planning Policy Framework (NPPF) is properly considered and is not undermined by plan led capacity being brought forward in advance of the corresponding population growth envisaged through substantial housing requirements.</p> <p>Notwithstanding the above, longer term forecasts should be treated with caution. This is because longer term floorspace requirements can be subject to change due to the innovative nature of the retail sector and associated consumer behaviour. This is reinforced by the Government's response to the CLG Select Committee Inquiry into the Operation of the NPPF (February 2015). The paper recommends that Local Authorities review their Local Plans regularly (in whole or part every five years) to ensure that they are up to date. It must therefore follow that if sites are to be allocated to meet the assessed retail need, these sites should be allocated in accordance with the sequential and impact tests (PPG: Paragraph 006 Reference ID: 2b-006-20140306) and subject to phased delivery in line with plan-led need. Any sites allocated in out of centre locations should be identified as reserve sites that might deliver retail development towards the end of the plan period, subject to regular plan led updates of capacity forecasts maintaining that such a need exists. This will ensure that sequentially preferable in-centre sites, such as the former East West Centre, which are considered as being able to meet the retail capacity for Stoke-on-Trent, are afforded sufficient time and assistance to come forward. This approach would accord with the town centre first requirement of the National Planning Policy Framework</p>	
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		<p>(NPPF) along with providing flexibility over the longer term to deliver planned retail needs if 1) plan led need exists; and 2) suitable evidence is provided to demonstrate that the town centre allocations cannot be delivered during the remaining lifetime of the plan. The sequential and impact tests would also remain to be passed. Local Plans that correctly interpret and include the plan making requirements of the NPPF as set out above give confidence to investors to take forward town centre development projects. Successfully delivering a town centre first approach will require policies for development management that are adapted to reflect and support local circumstances. The new Local Plan should not simply 'cut and paste' the sequential and impact tests from the NPPF but instead consider when and where need / capacity is likely to arise. This is to avoid the unintended consequences of an applicant seeking to deliver all of the floorspace at the start of the Plan period without supporting retail expenditure being available. It would be beneficial to define what the Council considers to be the appropriate scale and form of development for each of the town and local centres within the Joint Local Plan authorities.</p> <p>This will need to be determined by updated retail assessment work to identify any existing gaps in provision for each of the centres and therefore the scale and type of retailing required to support a sustainable future for the centres. The provision would also then allow capacity figures as informed by qualitative assessment to be set that are relevant to each centre and in turn the phasing requirements for delivering that capacity. This approach will secure the flexibility that the NPPF calls for over the lifetime of the plan, but ensures that the spatial strategy for growth is only altered through the plan making process where cross-boundary implications are appropriately considered, rather than through ad-hoc updates to evidence outside of the plan process.</p>	
IC021/228	Intu Properties	<p>Potential for Future Development Stoke-on-Trent</p> <p>As set out above, LPAs are required to plan positively, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, LPAs should, amongst other things, allocate a range of suitable sites to meet the scale and type of main town centre uses needed in town centres. Intu considers that it can play a significant part in providing for the need for additional retail floorspace in Stoke-on-Trent through bringing forward development on its sequentially preferable land holdings in the area around</p>	Noted - policies and site allocations will be set out at in the Draft Joint Local Plan in 2017

		Brewery Street and Bryan Street.	
IC028/276	Henry Davidson Developments	HDD supports the recognition that the Ryecroft site forms the most appropriate location for retail development within the town centre and considers that this should be reflected in subsequent iterations of the Joint Local Plan. HDD also consider that this text should be re-worded to reflect the fact that redevelopment of Ryecroft will see an existing town centre site brought forward for a mixed use development.	Comment noted. The Newcastle Town Centre SPD (2009) recognised Ryecroft as one of four key development sites within the town. Regeneration of the Ryecroft area is part of a major scheme to develop a new public sector hub in the town centre.
IC041/355	Network Rail	The following comments from the Joint Local Plan are noted.  Issue 3: Potential for Future Development Newcastle-under-Lyme 4.31 In Kidsgrove, the study identified a capacity for 1,430 square metres of comparison retail floorspace and 398 square metres of convenience retail floorspace between 2011 and 2026. Two sites are identified as potentially being suitable to accommodate this additional development – the lower car park at Heathcote Street and land between Liverpool Road and Kidsgrove railway station.	Comment noted.
IC045/369	Stafford Borough Council	With regards the need to find additional retail sites in Stoke-on-Trent, whilst the Borough Council would not object to this in principle, we would be concerned if this undermined the retail offer in Stafford Borough.	Noted - policies and site allocations will be set out at in the Draft Joint Local Plan in 2017.

#### Issue 4: Rural Service Centres

Reference	Consultee	Comments	Officer Comments
IC009/83	Councillor Derek R Davies - NDP Steering Group	The documents pay less than scant attention to the service and infrastructure needs of rural communities in the Plan area. <ul style="list-style-type: none"> <li>• The historic and continuing experience of the Rural South is that speculative developers are given permission for residential developments without being required to make meaningful contributions to the social and economic development of the affected communities.</li> <li>• Any and all residential development in rural locations needs to be part of a holistic development that includes provision for the needs of the expanded</li> </ul>	Generally retail and office needs within rural areas are less of an issue than in town centres, where retail is the predominant land use. Section 4, Issue 1 of the Joint Local Plan Issues Consultation document describes the existing retail hierarchy. Issue 4 covers Rural Service Centres, and explains

		<p>community. This includes shops, access to medical services and community, sport and cultural facilities.</p> <ul style="list-style-type: none"> <li>• Other vitally important services and facilities that are generally and repeatedly ignored in rural residential developments are: roads, sewerage, gas, water supply, electricity, telecommunications, public transport, police, fire and rescue services.</li> </ul>	<p>that the Core Spatial Strategy designated Audley Parish, Madeley and Loggerheads as Rural Service Centres because they provided the most comprehensive range of essential rural services. Paragraph 4.37 of the Issues Consultation paper states” evidence about the availability and accessibility of services in the rural area is being updated and will be considered at the Strategic Options stage”.</p>
IC017/209	Pochin Property	<p>In the adopted Core Strategy (2009), Audley Parish is identified as a ‘Rural Service Centre’, one of the settlements that provide the most comprehensive range of essential rural services. Audley has a good range of key services including several shops (including a Co-op and Tesco Express), several restaurants and pubs, a Library, a Theatre and a Community Centre. Two primary schools, Ravensmead County Primary School and Wood Lane Primary, are located in close proximity in the connected village of Bignall End. The Sir Thomas Boughy High School is located approximately 1 mile away. The village is well served by public transport with frequent bus services to Newcastle-under-Lyme and onwards to other destinations. The M6 and A500 are also in close proximity therefore providing easy access to Crewe and Stoke-on-Trent.</p> <p>Given its sustainability, and the need set out above to distribute additional growth outside of the urban centres, the Joint Local Plan should seek to allocate some housing growth in Audley over the plan period.</p>	<p>Comment noted. Housing issues are covered in the Housing consultation papers. Issues and evidence about housing needs will inform further stages of Joint Local Plan preparation. Housing growth policies and site allocations will be set out at in the Draft Joint Local Plan stage.</p>
IC027/265	Keele Parish Council	<p>Whilst the vibrancy of the rural economy is very positive, the provision of services is more problematic, and the JLP does not address the needs of rural communities in the area.</p> <p>Whilst most villages have kept their primary schools, most post-primary students have to travel to regional centres for secondary education. Few villages have their own resident doctor which means patients have to travel a distance for appointments, a real logistical problem for some elderly people.</p> <p>If there is to be development in rural communities other than the Rural Service Centres which already have medical, retail and community facilities, then such developments must consider the necessary services to support</p>	<p>Comment noted. See also response to IC009/83. Paragraph 4.37 of the Issues Consultation paper states” evidence about the availability and accessibility of services in the rural area is being updated and will be considered at the Strategic Options stage”.</p>

		<p>the growth of the community.</p> <p>For example, the absence of services for the young in rural areas often leads to vandalism and unruly behaviour, and the reduction of policing in villages is a major and growing concern, as is the rise in petty thefts, thefts from farms, and con men preying on the elderly and vulnerable.</p> <p>The slow roll-out of fibre optic cabling, makes access to the internet slow and sometimes problematic. This is a major problem for rural businesses.</p>	
IC071/531	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>We agree that the existing designation of Key Rural Service Centres, and their associated village envelope boundaries, should be reviewed.</p> <p>In the case of Loggerheads Parish, the Village Envelope around Knighton and Ashley should remain tightly drawn, as at present, and the only amendments to the Loggerheads Village Envelope should be the inclusion of the 'Sanatorium Development' adjacent to The Burntwood and the land recently consented in Mucklestone Road. The recent approval given at Hookgate should remain outside the village envelope as the development is clearly unsustainable.</p> <p>We contend that Loggerheads should cease to be regarded/referred to as a Rural Service Centre forthwith. When the designation was applied initially, the controlling plan was the Core Spatial Strategy. That limited development in Loggerheads to brown field sites within the Village Envelope. That would have produced no more than 20 residential units in the period up to 2026. We have previously established that neither the Borough nor Parish Council have any written evidence to support the erroneous contention that the Parish Council was consulted at the time the designation was proposed. That deprived the Parish Council of the opportunity to object to the designation when the plans proposed were examined by an Inspector.</p> <p>It is a serious departure from established protocol for the Borough Planning Department to carry the designation forward in the context of the NPPF as they have never revisited the accuracy of the designation</p>	<p>Comments noted. Three Rural Service Centres within Newcastle-under-Lyme were designated within the Core Spatial Strategy. These are Audley Parish, Madeley and Loggerheads. They were designated because they provided "the most comprehensive range of essential rural services" at that time. Evidence about the availability and accessibility of services in the rural area is currently being updated and will be considered at the Strategic Options stage. The Parish Council would have had an opportunity to comment on that designation as part of the public consultation process of the Core Spatial Strategy. The NPPF is dated March 2012 and post-dates the Core Spatial Strategy. Issue 4 of the City, Town, Local and Other Centres Consultation paper states that the existing designation of Rural Service Centres and village envelopes in Newcastle-under-Lyme will need to be reviewed.</p>
IC072/548	Dean Lewis (Tim Dean)	<p>Dean Lewis Estates supports the I&amp;O 'Key Message' which recognises that the existing designation of Rural Service Centres in Newcastle-under-Lyme "will need to be reviewed and that the existing village envelope boundaries will need to be reviewed to ensure that they are up to date".</p>	<p>Comment noted.</p>
IC072/549	Dean Lewis (Tim Dean)	<p>The I&amp;O also notes that three Rural Services Centres are identified in the existing adopted Core Spatial Strategy as locations that provide the most</p>	<p>Issue 4 of the City, Town, Local and Other Centres Consultation paper</p>

		comprehensive range of essential rural services in the borough. These are Audley Parish, Loggerheads and Madeley. Channelling development towards these urban centres inside the North Staffordshire Green Belt boundary will, subject to the necessary Strategic Environmental Assessment, deliver the most sustainable form of growth.	states that the existing designation of Rural Service Centres and village envelopes in Newcastle-under-Lyme will need to be reviewed. The role of the Joint Local Plan is to devise a strategy to achieve sustainable development that is in the widest possible public interest. Policies and site allocations will be set out at in the Draft Joint Local Plan.
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<b>Issue 5: The Role of Local and Neighbourhood Centres in the Urban Environment</b>			
<b>Reference</b>	<b>Consultee Name</b>	<b>Comments</b>	<b>Officer Comments</b>
IC005/29	St Modwen	It is agreed that Local and Neighbourhood Centres provide an important role within the provision of helping local communities meet their day-to-day needs. Specifically, the Local Centre at Norton, situated on Leek New Road (indicated on the plan at Appendix 1) has the capacity to expand to the north to provide a range of local centre uses. The land previously had consent for a range of town centre uses which has now lapsed. It is recommended that the site could still provide a mix of these uses and that its inclusion within the Norton Local Centre would secure these facilities. 5.6 A local centre is also proposed as part of the Etruria Valley SPD which should be acknowledged within the Joint Local Plan, further consideration is however required for the optimum location for this local centre so as to fully support the employment uses and not constrain future land uses	Noted - policies and site allocations will be set out at in the Draft Joint Local Plan in 2017
IC069/507	Neil Dawson	Ensure the importance of local communities such as those in all of the towns in Stoke-on-Trent.	Noted



## Schedule of Comments – Transport

General Transport Issues			
Reference	Consultee Name	Comments	Officer Comments
IC009/84	Councillor Derek R Davies - NDP Steering Group	The plan appears as a series of initiatives, rather than a co-ordinated, integrated transport policy. · What little focus is given to the subject is largely in the context of the conurbation rather than across the whole Joint Local Plan area. Limited attention is paid to the rural community, except perhaps where it feeds the conurbation.	This stage of the plan making process is to set out the key issues, challenges and demands on the area, rather than a plan of policies to address them. It is true that the technical paper does set out the series of existing initiatives. Issues are presented across both urban and rural areas; the public transport key issue is explicit about rural areas.
IC009/85	Councillor Derek R Davies - NDP Steering Group	Although the plan covers the period 2013-2033 it is very disappointing in terms of its vision for the future of transport in the area. The assumption throughout the document is that tomorrow will be a straightforward extrapolation of today's services, technologies, infrastructure and means of commuting, with little or no account being taken of the huge strides that are being made in the field of transport systems and infrastructure. Whether driven out of, or embraced in the Local Plan, these will inevitably have a bearing on the assumptions which underpin the Plan. · The document mentions plans to widen certain major roads towards the end of the plan period, however there is no recognition that road traffic may in fact decrease over time due to the adoption of new technologies and that the money may be better spent elsewhere. · There is no mention of electric cars and the need to provide charging points both in rural and urban areas. · The document mentions plans to widen certain major roads towards the end of the plan period, however there is no recognition that road traffic may in fact decrease over time due to the adoption of new technologies and that the money may be better spent elsewhere. · Towards the end of the plan period we can expect autonomous vehicles to be common on our roads but there is no recognition of this or how this could be turned to the advantage of the plan area.	This stage of the plan making process is to set out the key issues, challenges and demands on the area, rather than a vision to address them. There is no evidence to forecast a reduction in road traffic. Government forecasts show the trend of increasing road traffic continuing. Significant adoption of technology such as the internet and mobile telecommunication have not caused a decrease in road traffic. Technology such as electric and autonomous vehicles may lead to an increase in road traffic as they overcome barriers to vehicle use for some.
IC046/372	Cheshire East	The recognition that development proposed in the Cheshire East Local Plan	Comment noted



		may result in a need to review the Integrated Transport Strategy if there is an impact on the borough, for example through increased patronage at Kidsgrove railway station	
IC046/373	Cheshire East	That it is proposed to work with partners to recognise and improve rural services, including cross boundary connections.	Comment noted
IC057/426	Paul Baddeley	Document does not read as one document it reads as a Stoke and Newcastle one put together - its needs to address one conurbation.	A lot of evidence is only available at Local Authority level so has to be presented separately. Issues have been presented on a Joint basis.
IC066/494	Elena Sudlow (Maer & Acton Parish Council)	We would hope that in putting this plan together you take consideration of supported transport in the rural area.	Comment noted. The NPPF recognises that transport needs in rural areas will be different to urban areas and the need to travel will be greater, but this needs to be considered in light of wider policies relating to sustainable development.
IC069/508	Neil Dawson	Stress the need for an integrated transport which would also cover ticketing.	Comment noted. Integrated transport including ticketing will help address the key challenge: Improving accessibility and increasing usage of bus and rail services. The Local Transport Plan advocates a positive approach towards improving public transport accessibility through measures such as subsidised bus services, community transport schemes and assisting members of the community in special need to access employment opportunities. This evidence will inform further stages of Joint Local Plan preparation.
IC076/581	W Naylor	In Stoke-on-Trent many of these green corridors have been barriers in place which steer all the following recreational users: mobility scooters, pram and buggy pushers, pedal tricycles and horse and pony riders - all seeking safe off road tracks in pursuit of exercise and safe areas. (multi user tracks work just fine in many urban and urban fringe areas)	Comment noted, but unclear what point is being made. The City Council has a policy of accessible greenspace.
IC076/583	W Naylor	Intrinsically linked to 5.12/5.13 (ROWIP)	Green corridors and multi-functional green infrastructure in general will be a key element of the Joint Local Plan.

			<p>Policy ASP6 of the existing Joint Core Spatial Strategy relates to the rural area of Newcastle-under-Lyme and seeks to facilitate the improved provision of off-road routes for horses and cyclists and integration with an enhanced public rights of way network, as part of the implementation of the Staffordshire Rights of Way Improvement Plan. In accordance with the Local Transport Plan, a positive approach is taken towards improving public transport accessibility through measures such as subsidised bus services, community transport schemes and assisting members of the community in special need to access employment opportunities. This evidence will inform further stages of Joint Local Plan preparation.</p>
IC077/590	Andy Perkin (Potteries Heritage Society)	<p>This section seems to contain mixed messages - if there is low car usage, declining bus usage, few people walking or cycling, then how are people getting about. And how does this equate to already high emissions and poor air quality?</p>	<p>Accessibility issues mean some residents struggle to get about. Relatively low use of these modes, sits alongside congestion at a level typical of urban area, including journeys from surrounding areas. The Local Transport Plan identifies complex travel patterns mean the local transport network is operating inefficiently. Average weekday morning peak vehicle journey time show our 'A' roads are amongst the slowest outside of London. The amount of traffic and congestion generate carbon emissions, and also lead to noise and air quality issues, with the whole of the City of Stoke-on-Trent declared an Air Quality Management Area (AQMA) together with areas of</p>

			Newcastle-under-Lyme due to exceedances of nitrogen dioxide concentrations. These are issues that will inform further stages of preparation of the Joint Local Plan.
IC077/591	Andy Perkin (Potteries Heritage Society)	We are concerned that there is a failure to recognise the value of rail connectivity as an attraction to inward investment in the area and the potential impact of HS2 on both the existing and future connectivity, as well as the potential for all types of development being drawn towards Junction 16 of the M6 and the resulting pressure on land along the northern section of the A500 corridor.	The introduction to the Transport Issues explains that transport plays an essential role in helping to ensure that areas and their residents reach their potential, and that transport is an enabler of economic activity. Rail connectivity as a strength is explained, but the role as a stimulator of development could be strengthened. The Government's proposals to construct a high speed rail link from London to Manchester and the potential impact on the plan area of such a proposal have not been taken into account in the Joint Local Plan process at this stage. The Government has set out the intention to locate the HS2 route between Fradley in the West Midlands and Crewe. Further consideration will need to be made regarding this government proposal as the Joint Local Plan progresses. It is therefore recognised that HS2 will have implications for the Joint Local Plan process, as well as, the long term development strategy itself. This position will be kept under continual review as the development plan progresses and when appropriate evidence will be updated to take account of the proposal.
IC077/592	Andy Perkin (Potteries)	Much of this section seems to consider commuting as something to be avoided - while it remains unavoidable for many - but only relates the	Noted, although current travel to work patterns are predominantly local,

	Heritage Society)	problem to those travelling between Stoke-on-Trent and Newcastle-under-Lyme. Our concern is that current central government policies are leading to an excessive focus large existing regional centres (London, Manchester, Birmingham and Leeds) where development and the relocation of major employers is encouraged - denying smaller cities some of the better paid jobs and reducing the offer for their citizens across different skills and sectors. This has the potential to encourage more commuting or migration from the area.	economic issues affect this pattern.
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<b>Issue 1: Walking and Cycling</b>			
<b>Reference</b>	<b>Consultee Name</b>	<b>Comments</b>	<b>Officer Comments</b>
IC004/17	University Hospitals of North Midlands NHS Trust	The Trust supports the aims to improve walking and cycling routes and increase the reliance on public transport, which will help in the creation of sustainable communities. The Trust also supports increasing access and connectivity to other parts of the county and within the conurbation.	Comment noted and we welcome this general support for sustainable transport. Paragraph 6.9 of the Issues Consultation paper states transport systems can have a major impact on lifestyles and the quality of the environment, as well as, the location of development. The Joint Local Plan will need to consider the way in which places are connected, not just the way people travel but how far they have to travel to access services and places of employment. Other key factors will be the amount of access to good quality, well maintained public spaces, including green infrastructure, and access to healthy food options. Multi-functional green infrastructure has a role in delivering sustainable communities. Green Infrastructure Strategies will inform further stages of Joint Local Plan preparation.
IC008/50	Natural England	Access and Rights of Way Natural England welcomes the report's reference to this theme under	Advice noted.

		<p>Transport (Issue 1 Walking and cycling) and the key issue and challenge as follows:  Key message  The infrastructure to meet the needs of people to walk, cycle and ride horses is limited most notably alongside and across busy roads, e.g. Newcastle ring road, in the rural south of Newcastle (for walking and horse riding) and across the urban area.  Key challenge  Providing walking and cycling infrastructure to support transport and leisure needs.  Recognising and integrating connections to existing public rights of way. Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 75 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 74 of the NPPF. The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 73 of the NPPF. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p>	
IC009/88	Councillor Derek R Davies - NDP Steering Group	<p>There is reference to providing walking and cycling infrastructure to support transport and leisure but this is mainly in the context of the urban areas. The situation also needs to be addressed in the rural communities for the same reason and as a means of encouraging tourism in the rural area. In the rural areas need a focus on restoring the neglected and fragmented network of footpaths and off-road routes which would make the area attractive to walkers and cyclists that. Access to many footpaths in the rural area has now become difficult if not impossible due to the network becoming fragmented by busy roads – ways need to be found to re-connect these routes into a coherent network. Leisure-oriented routes need to be complemented with businesses which leisure users will need, e.g. cafes, pubs, craft shops, which also need to have adequate car parking and secure bike storage. A key enabler for increasing cycling is the provision of secure cycle parking points. There is no mention of this.</p>	<p>Provides more detail for the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs. The Issues paper acknowledges providing walking and cycling infrastructure to support transport and leisure needs; and recognising and integrating connections to existing public rights of way, as issues for the Joint Local Plan. Evidence on these issues will inform further stages of Joint Local Plan preparation.</p>

IC009/119	Councillor Derek R Davies - NDP Steering Group	<p>In the Rural South the PRow network has become fragmented due to the greatly increased volume and speeds of traffic on the classified roads at which many footpaths and tracks terminate. Where there is no footway or verge, or where unmaintained or deteriorated verges are unsuitable for walking along, these roads are unsafe for walking. Where paved footways or suitable verges do exist, the volume, speed and type of traffic create an unpleasant walking environment.</p> <p>The classified roads that now fragment the PRow network were once part of the network of rural foot-traffic routes – because the PRow network originates from routes across fields and along tracks, lanes and turnpike roads that were used by local foot-traffic to connect rural settlements to one another and to places of work.</p> <p>The sparseness of the PRow network in the Rural South reflects a historically lower density of population than in other rural parts of NuL. Consideration needs to be given to (1) how fragmentation of the network can be remedied and (2) how the network in the Rural South could be extended.</p> <p>Lanes</p> <p>The volume and speed of traffic on country lanes is a problem for both walkers and cyclists. Designation of ‘quiet lanes’, subject to a 20mph speed limit, can be applied to certain lanes that are popular and frequently used walking routes. Action needs to be taken to avoid some country lanes being used as ‘rat runs’.</p>	<p>Provides more detail for the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs.</p> <p>The Staffordshire Rights of Way Improvement Plan (ROWIP) identifies that there is a mismatch between the demand for walking routes and their availability in the south west of Newcastle-under-Lyme borough, around Ashley, Keele, Loggerheads and Whitmore. This evidence will inform further stages of Joint Local Plan preparation.</p>
IC011/155	Thistleberry Residents Association	<p>5.9 Unfortunately the topography of Newcastle and Stoke does not make walking and cycling easy. Busy roads and steep hills into and out of these centres make it difficult for the elderly and the very young and the less than fit. Obesity in this locality is noted by this document, but in planning terms fast food outlets proliferate (as do pubs). Perhaps an inventory of fast food outlets and outlets selling alcohol needs to be taken (and where they are) as a means for this Plan to make a connection between these issues and attempt to address them – which is the purpose of the whole Plan process</p>	<p>Supports accessibility issues and that busy local roads form a barrier for walking and cycling and more detail for the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs noted. We note the comment about the relationship between health issues and locations of particular food and drink uses. Evidence on these matters can inform further stages of Joint Local Plan preparation.</p>
IC013/188	Staffordshire Chamber of Commerce	<p>We agree with the focus on improving transport connectivity and the efficient and effective movement of people, goods and services to support growing firms and maximise the economic potential of the area. It is</p>	<p>Noted. Sustainable transport is a key element of sustainable development and will inform further stages of Joint</p>

		essential that residential areas are properly connected to employment sites, (3.37), and that alternatives options to use of the private car are available, including walking, cycling and public transport.	Local Plan preparation.
IC022/236	Joan Walley	Far more priority could be given to the role of the canal for well-being and tourism purposes. Also, more up-to-date detail is needed in respect of the rights of way map across Stoke on Trent, including what work is still outstanding and how footpaths and walking can be better integrated into travel plans etc.	Provides support for the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs. The canal network is acknowledged as part of the valued green infrastructure network. Green corridors and multi-functional green infrastructure in general will be a key element of the Joint Local Plan. Recognising and integrating connections to existing public rights of way has been recognised as an issue for the Joint Local Plan. Evidence on this will inform further stages of Joint Local Plan preparation.
IC027/266	Keele Parish Council	The maintenance of pavements along busy A and B roads is poor, and this seems to be a low priority for local authorities. Over-hanging hedges adds to walkers' problems and we rely on the good will of local landowners to cut hedges as enforcement is virtually impossible.	Noted - maintenance of infrastructure important part of provision.
IC041/358	Network Rail	Following comments noted: Issue 1: Walking and Cycling • Providing walking and cycling infrastructure to support transport and leisure needs. • Recognising and integrating connections to existing public rights of way.	Noted
IC057/425	Paul Baddeley	Fully support walking and cycling. Faster public transport to fringe areas e.g. Chesterton and Talke from station and city centre.	Noted. National Policy advocates local plans should support patterns of development that maximise sustainable modes of transport. An efficient, sustainable transport network is a key element of economic growth and will inform further stages of Local Plan preparation.
IC063/473	Judith Oppenheimer	In the Rural South the PRoW network has become fragmented due to the greatly increased volume and speeds of traffic on the classified roads at which many footpaths and tracks terminate. Where there is no footway or verge, or where unmaintained or deteriorated verges are unsuitable for	See response to IC009/119. Provides more detail for the identified key challenge: Providing walking and cycling infrastructure to support

		<p>walking along, these roads are unsafe for walking. Where paved footways or suitable verges do exist, the volume, speed and type of traffic create an unpleasant walking environment.</p> <p>The classified roads that now fragment the PRow network were once part of the network of rural foot-traffic routes – because the PRow network originates from routes across fields and along tracks, lanes and turnpike roads that were used by local foot-traffic to connect rural settlements to one another and to places of work.</p> <p>The sparseness of the PRow network in the Rural South reflects a historically lower density of population than in other rural parts of NuL. Consideration needs to be given to (1) how fragmentation of the network can be remedied and (2) how the network in the Rural South could be extended.</p>	transport and leisure needs.
IC063/474	Judith Oppenheimer	The volume and speed of traffic on country lanes is a problem for both walkers and cyclists. Designation of ‘quiet lanes’, subject to a 20mph speed limit, can be applied to certain lanes that are popular and frequently used walking routes.	Supports accessibility issues and that busy local roads form a barrier for walking and cycling and more detail for the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs noted.
IC063/476	Judith Oppenheimer	Access to the countryside brings the inevitable risk of wear and tear on the environment. Clear designation and signposting of footpaths and other accessible areas and regular inspection and maintenance of such areas are a must. Likewise, users of the countryside need guidance on respect for the environment and the proper use of footpaths and other facilities.	Comment noted, although the Joint Local Plan has no control over the maintenance of countryside footpaths and facilities.
IC071/532	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>Although this statement is quoted in the context of the urban area, I believe it very applicable to the parish, in particular the barrier formed around Loggerheads and Ashley Health by the A53 and B5026.</p> <p>Staffordshire Rights of Way Improvement Plan (ROWIP) is used to identify that in the rural areas of Loggerheads there is a mismatch between demand for walking, cycling and horse riding routes and the provision thereof. The ROWIP was drafted in 2007 and is applicable for 10 years. The demand pressure appears to be based on 2001 Census data. I can find no update on when/if the ROWIP is to be updated by the borough council (BC).</p> <p>“The number of people participating in outdoor recreation is likely to increase due to an increasing number of retired people with leisure time on their hands.”</p> <p>“The growth in the number of older people will, therefore, have implications</p>	Provides more detail for the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs. The Rights of Way Improvement Plan is a matter for Staffordshire County Council as Highway Authority. Both Councils are updating their evidence bases as part of Local Plan work and availability of multi-functional green infrastructure, sustainable transport networks and sustainable communities is a key issue for the Joint Local Plan. The



		<p>for the management, maintenance and improvement of the local rights of way network as the demand for more easily accessible routes increases” [ROWIP, p16]</p> <p>The above two statements appear to be particularly relevant to the Loggerheads Parish given the demographic data.</p> <p>On balance we think the key message is valid to Loggerheads, we need to understand if the ROWIP is to be updated</p>	<p>Loggerheads Neighbourhood Plan could offer a solution to some of these local issues.</p>
IC072/564	Dean Lewis (Tim Dean)	<p>Improvements to walking and cycling infrastructure to support leisure and recreation needs should also be enshrined within policy.</p>	<p>Supports the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs. . The Issues paper acknowledges providing walking and cycling infrastructure to support transport and leisure needs; and recognising and integrating connections to existing public rights of way, as issues for the Joint Local Plan. Evidence on these issues will inform further stages of Joint Local Plan preparation.</p>
IC076/582	W Naylor	<p>ROWIP? Very little from that was enacted in our area. There are no routes for horse riders around Madeley Heath. Stoke has not definitive map and Newcastle still has the lowest % of bridleways in the county what is needed are multi-user tracks properly marked and accessible and effort made to create proper (unbarriered) links across the whole of the JLP area.</p>	<p>Supports the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs. Existing Core Spatial Strategy Policy ASP6 relates to the rural area of Newcastle-under-Lyme and seeks to facilitate the improved provision of off-road routes for horses and cyclists and integration with an enhanced public rights of way network, as part of the implementation of the Staffordshire Rights of Way Improvement Plan. Both Councils are updating their evidence bases as part of Local Plan work and availability of multi-functional green infrastructure, sustainable transport networks and sustainable communities is a key issue</p>

			for the Joint Local Plan.
IC077/593	Andy Perkin (Potteries Heritage Society)	5.11 says that "Signage to support walking and cycling falls short of best practice" but there is no corresponding key challenge or suggested means by which this could be addressed.	Signage and wayfinding is part of the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs.
IC079/604	Andy Perkin (on behalf of) Stoke Neighbourhood Forum	5.11 says that "Signage to support walking and cycling falls short of best practice" but there is no corresponding key challenge or suggested means by which this could be addressed.	Signage and wayfinding is part of the identified key challenge: Providing walking and cycling infrastructure to support transport and leisure needs.
IC080/613	Nicky Davis	Work with neighbouring borough councils and county council and canal and river trust and highways agency closely to provide seamless transitions between areas. There is a map of frequently used permissive pedestrian routes throughout Stoke-on-Trent being drawn up in conjunction with Ramblers. These are in the main not public footpaths but are valuable for the community. I would like to see these prioritised and considered and improved within any development plan.	Noted -these are key stakeholders for the plan making process. The map referred to can provide a valuable evidence document to inform further stages of Joint Local Plan preparation, please ensure it is identified.
IC081/617	Celia Richie	With regard to encouraging cycling I don't think it would be safe to cycle around Newcastle's ring road as it is very busy, too many busy roundabouts and highly polluted in some areas. A recent report has come out stating air pollution from cars can cause heart problems, strokes and bronchial problems. I rarely see cyclists on the cycle tracks provided by S-O-T just lots of parked cars!	Supports the transport issues described related to cycling. Data shows increased use of cycle facilities where improvements have been made. The amount of traffic and congestion generate carbon emissions, and also lead to noise and air quality issues, with the whole of the City of Stoke-on-Trent declared an Air Quality Management Area (AQMA) together with areas of Newcastle-under-Lyme due to exceedances of nitrogen dioxide concentrations. Take-up of cycling can be influenced by this matter. Healthy communities are a key part of sustainable communities. Both Councils are updating their evidence bases as part of Local Plan work and availability of multi-functional green infrastructure, sustainable transport networks and sustainable communities are a key

			issue for the Joint Local Plan.
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## Issue 2: Public Transport

Reference	Consultee Name	Comment	Officer Comments
IC009/87	Councillor Derek R Davies - NDP Steering Group	Issues concerning public transport are recognised in the issues document but largely in the context of the feed into and within the conurbation. This includes reference to rural public transport services. However, there is no mention of the limitations of or need for public transport services within the rural communities. If this was addressed it would provide a vital lifeline between the communities, especially for the young and elderly and also help to boost the rural economy as people would be able to access local shops and services, instead of commuting into the urban areas. It would also help to reduce the load on the infrastructure within the urban areas and improve - Much is made of the under-utilisation of buses but there is no recognition that empty buses are a major source of emissions, noise and congestion. Operators must be encouraged to use vehicle sizes which are more appropriate and also to look at ways in which re-planning of routes and timetables and flexible or on-demand routing could improve utilisation. - On-demand public transport needs to be considered particularly for the rural area, where fixed routing is difficult to maintain economically, and which tends to leave many communities isolated. Current thinking seems to be to provide subsidies to under-utilised fixed routes which do nothing to resolve the situation. There should be more integration of the bus and rail networks, for example by providing a free-of-charge link service between train stations and key destinations at interchange points	Provides more detail for the identified key challenge: Improving accessibility and increasing usage of bus and rail services, and suggests potential solutions. Bus services are mostly commercial routes and are operated by private companies. PlusBUS ticket add-on is available from Stoke-on-Trent Railway Station.
IC009/103	Councillor Derek R Davies - NDP Steering Group	Lack of adequate public transport in the rural area is a major problem to be addressed, particularly the lack of services on weekends and holidays. One-fifth of NuL households have no access to a car, which means that they also have no or very limited access to the borough's rural heritage.	Provides more detail for the identified key challenge: Improving accessibility and increasing usage of bus and rail services, and suggests potential solutions.

IC009/120	Councillor Derek R Davies - NDP Steering Group	<p>The planning system recognises the health and well-being benefits of access to and recreation/ exercise in the natural environment.</p> <p>The rural areas are poorly served by public transport. Some areas have no bus service at weekends and holidays. Some attractions, e.g. the Dorothy Clive Garden at Willoughbridge, are inaccessible by public transport even during the week. This means that people with no access to a car have little opportunity to enjoy and benefit from the rural environment and its attractions. Twenty per cent of households in NuL have no access to a car. The Joint Local Plan needs to consider provision of public transport between the urban and rural areas and within the rural area. It also needs to consider the location of the different attractions within the rural area so that suitable public transport services can be devised to take people to the places that they would like to visit. The disused railway line that runs from Silverdale through Keele to Manor Road, Baldwins Gate could be brought back into use as one means of public transport into the Rural South, specifically to walking areas.</p>	Provides more detail for the identified key challenge: Improving accessibility and increasing usage of bus and rail services, and suggests potential solutions.
IC022/235	Joan Walley	As an aside the transport sections need to address the against the national trend of reduced bus ridership and link the bus services to the needs of local people rather than impose routes which abandon sizeable parts of the urban area.	Comment noted. Local Authorities have to work in partnership with commercial bus operators for the provision of bus routes.
IC027/268	Keele Parish Council	Limited public bus services are a real problem for some villages.	Noted
IC039/348	Mr A P Thompson	<p>An impression is created that SOT is on the West Coast Mainline which is not the case. Regarding development of the East-West Crewe Derby Line. A new station at Fenton has been mentioned. Local traffic would not justify this and the Britannia Stadium is a mile away. Someone should speak to Coventry Council regarding their new station at the Ricoh Stadium and the problems found. However the Kidsgrove Crewe section of this route needs to be addressed regarding HS2. The access to a new station at Crewe from this line is likely to come under the "too difficult" category, but there appears to be an assumption that passengers from SOT will go by train to Crewe and board an HS2 train, this will extend the journey time to Euston and it is therefore essential that a simplified version of the existing Virgin service is retained. Passengers going by road to the new HS2 station will encounter severe delays at the M6 junction, as now.</p>	<p>Comments on maintaining train services noted. SOT is served by the Manchester arm of the West Coast Main Line. We are aware of the problems serving Ricoh Arena due to shortage of diesel rolling stock. The introduction to the Transport Issues explains that transport plays an essential role in helping to ensure that areas and their residents reach their potential, and that transport is an enabler of economic activity. Rail connectivity as a strength is explained, but the role as a stimulator of development could be strengthened. The Government's proposals to</p>

			construct a high speed rail link from London to Manchester and the potential impact on the plan area of such a proposal have not been taken into account in the Joint Local Plan process at this stage. The Government has set out the intention to locate the HS2 route between Fradley in the West Midlands and Crewe. Further consideration will need to be made regarding this government proposal as the Joint Local Plan progresses. It is therefore recognised that HS2 will have implications for the Joint Local Plan process, as well as, the long term development strategy itself. This position will be kept under continual review as the development plan progresses and when appropriate evidence will be updated to take account of the proposal.
IC040/352	Gordon Lancaster - Madeley Conservation	If legal, mini buses run by volunteers and supported by charities might alleviate temporary gaps from commercial firms, but these should not be able to pick and choose routes at will.	Noted. The Community Transport schemes run in Staffordshire are detailed on the County Council website under 'Call-and-Book-Services'.
IC041/356	Network Rail	The following comments is noted: Whilst National and local rail connections are generally good, these services are of a low frequency and capacity and pedestrian accessibility at the smaller stations presents a problem for those with lower mobility. Key Challenge: Improving accessibility and increasing usage of bus and rail services.	No comment needed.
IC041/359	Network Rail	The following comments are noted: Issue 2: Public Transport <ul style="list-style-type: none"> <li>• Improving accessibility and increasing usage of bus and rail services.</li> <li>• Working with partners to recognise and improve rural services.</li> </ul>	Noted
IC055/421	Christopher Round	If we can't get directly to areas in the city either early mornings or at night (for work or leisure) how can they describe it as "good" i.e. Festival Park, Tunstall, Burslem and Newcastle are isolated from the north east of the city at night and I'm sure other areas of the city have similar problems.	The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity. Access at early and late

			times are prime example of accessibility issues.
IC056/422	Marsha Wright	<p>I feel that Tunstall has appalling public transport links, making almost impossible to get around. Buses to Newcastle are infrequent and unreliable and the withdrawal of the service from Tunstall to Festival Park is nothing short of disgusting! Festival Pak is the home to many shops and leisure activities and the people of Tunstall who are reliant on public transport are being prohibited of taking advantages of this. Yes, you can go to Hanley and get a second bus but why should we when there has always been a service available?</p> <p>More buses need to be laid on at night, particularly at the weekend so that we can enjoy an evening out in Newcastle without paying expensive taxi fares.</p> <p>The withdrawal if the number 98 service to and from Keele is another huge disappointment - who made the decision to remove this service and why? It was both reliable and well used by University staff and students, arriving at Newcastle in plenty of time for many to catch their connecting bus services.</p>	The Key Messages state that across both urban and rural areas there are problems with connectivity, accessibility and bus punctuality. Access at late times is a prime example of the accessibility issue. These examples of only indirect travel options by bus are examples of poor connectivity. Bus services are mostly commercial routes and are operated by private companies.
IC057/424	Paul Baddeley	<p>Transport - A huge problem given the vast size of the conurbation and lack of transport options - few train journeys available within (Kingsgrove - Longport - Stoke - Longton). No connection with the city centre and Newcastle. Bus services reducing, increasing use of private hire. Need better options, particularly involving Stoke/ Universities, train station, city centre, festival park and Newcastle.</p>	The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity.
IC060/435	Richard Oppenheimer	<p>4.3 Bus services – need to recognise that there needs to be a review of where bus routes are, following a long period of decline and no attempt to identify travel need patterns and introduce more flexible routing and on-demand services.</p>	The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity. Bus services are mostly commercial routes and are operated by private companies.
IC063/475	Judith Oppenheimer	<p>The rural areas are poorly served by public transport. Some areas have no bus service at weekends and holidays. Some attractions, e.g. the Dorothy Clive Garden at Willoughbridge, are inaccessible by public transport even during the week. This means that people with no access to a car have little opportunity to enjoy and benefit from the rural environment and its attractions. Twenty per cent of households in NuL have no access to a car.</p>	The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity. Access to leisure uses in rural area is an example of these accessibility issues. Key Challenges

		The Joint Local Plan needs to consider provision of public transport between the urban and rural areas and within the rural area. It also needs to consider the location of the different attractions within the rural area so that suitable public transport services can be devised to take people to the places that they would like to visit. The disused railway line that runs from Silverdale through Keele to Manor Road, Baldwins Gate could be brought back into use as one means of public transport into the Rural South, specifically to walking areas.	includes working with partners to recognise and improve rural services, including cross boundary connections.
IC071/533	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	As far as we can tell the NUL Integrated Transport Strategy [NULITS] was issued in draft form in May 2015. The Transport Technical Paper states that the NULITS will be subject to review throughout the development of the Local Plan. The 'core bus' network referenced in the key message relates to 'inter-urban and local routes'. A Loggerheads and Ashley Voluntary Car Scheme is mentioned to support commercial bus services [NULITS p4]. The Transport Technical Paper [p6] quotes the Staffordshire Local Transport Plan 2011; 'improving bus services, helping residents to access services and supporting rural communities' Neither the Transport Technical Paper nor the NULITS make any specific statements about the rural bus services or any plans to improve the service – which we assume is down to commerciality.	This stage of the plan making process is to set out the key issues, challenges and demands on the area, rather than a plan of policies to address them. The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity. Bus services are mostly commercial routes and are operated by private companies.
IC072/563	Dean Lewis (Tim Dean)	Improving accessibility and increasing usage of bus and rail services is also strongly supported. A coordinated policy approach should also ensure that stakeholders work to improve connectivity between urban and rural areas by sustaining and enhancing rural services. This should also include including cross boundary connections with neighbouring districts. Providing additional growth in rural areas will help to assist the commercial viability of such transport services thus help to sustain services	The Key Messages state that across both urban and rural areas there are problems with accessibility and connectivity. Bus services are mostly commercial routes and are operated by private companies. Key Challenges includes working with partners to recognise and improve rural services, including cross boundary connections.
IC073/567	Jason Barnett	Sustainable transport in my opinion is an area which could be looked at. At the present time D and G buses run the only public bus service through Madeley, North Staffs. My particular interest is with Diesel vehicle (Bus) emissions, maybe both councils could look at working with public transport companies who provide these services, and maybe encourage them to switch to more fuel efficient vehicles, i.e. battery powered/hybrid vehicles.	Bus services are mostly commercial routes and are operated by private companies.
IC075/572	Steven Matthews	All local bus companies could have joint bus day tickets. also use brownfield sites for new housing and maybe new businesses	The North Staffordshire Smart range of bus tickets and PlusBus add-on to rail

			tickets to/from Stoke-on-Trent railway station are multi-operator ticketing schemes.
IC082	North Staffordshire Pensioners Convention	Our ten-point criteria for a successful integrated public transport system, is a benchmark for our work. To effectively integrate public transport modes for pedestrians, cyclists, bus and local train passengers, and taxi drivers, providing seamless travel attractive for commuters to leave their cars at home, North Staffordshire badly needs a long term central Government and regional agency funding commitment for a PTE transport organisation, even as the economic outlook for the UK is gloomy. We consider it necessary that we have a reliable and regular public transport system, with modern fleets of hybrid buses, and longer trains, connecting with all areas and operating from 5am to 11pm, police monitored and intimidation-free.	Noted

### Issue 3: Connectivity and Tackling Traffic Congestion

Reference	Consultee Name	Comments	Officer Comments
IC009/86	Councillor Derek R Davies - NDP Steering Group	<p>There is recognition of the high levels of congestion within the conurbation area and there is reference in the Housing issues paper to the high numbers of people commuting from rural areas within Staffordshire. However, there is no attempt to address the fact that the situation will be further exacerbated if rural housing development is allowed to continue unabated and unless something is done to develop the rural economies through the provision of sustainable and appropriate rural employment opportunities. The document refers to “the good transport systems to the other parts of the country via the M6, A50, A500 and A34”. However there is no mention of the A53, which is a major feed route into the conurbation and a major link to the M6 for commuters, businesses and industry in parts of adjoining Cheshire and Shropshire. This road is already congested and dangerous and will inevitably be impacted further by the housing and employment growth projections in the Plan.</p> <ul style="list-style-type: none"> <li>The reasons for not including HS2 in the Issues paper is understood but attention should be given to the opportunity and need to incorporate parts of the existing West Coast line into the local transport infrastructure when HS2 is operating. This could include re-opening long closed stations and rural tracks as a means of providing additional infrastructure and capacity into the</li> </ul>	A53 is a major route across the plan area and provides important links to neighbouring areas. Different spatial options will have varying effects on transport issues. Details of HS2 are included in the technical paper, and extra rail capacity from Network Rail investment, in particular Norton Bridge and Stafford area, and HS2 providing opportunities for improving national connectivity, improved regional passenger services, and freight services, is listed as a strength for the plan area. The whole of the City of Stoke-on-Trent and areas within Newcastle-under-Lyme have been declared Air Quality Management Areas.



		<p>conurbations, thus helping to relieve load and pollution.</p> <ul style="list-style-type: none"> <li>· There is no mention of embracing alternative, environmentally friendly transport initiatives and systems, or the important part that they play in addressing and relieving congestion and pollution.</li> <li>· Zero Emission Vehicles could help with air quality and noise issues. Adopting Low Emission Zone standards for trucks and buses in the urban area should be considered as a way of improving both air quality and noise.</li> </ul>	
IC012/174	Keele University	<p>The challenges and key messages identified in the consultation document are not disputed. However, in support of the economic drivers and housing needs, serious thought needs to be given to a supporting transport strategy ensuring the housing and employment centres are properly connected.</p> <ul style="list-style-type: none"> <li>- The University would also encourage thinking around a transport hub to the west of Newcastle providing inward connectivity, links between social and leisure amenities and park and ride solutions minimising traffic flows throughout the area. The release of land alongside employment and housing could easily facilitate these aims whilst opening up links to the west of the county.</li> </ul>	Noted
IC042/360	Highways England	<p>Section 5 of the consultation document covers Transport matters. Highways England welcomes the acknowledgement that transport plays an essential role in the economy and can enable areas to reach their potential – and concurs that one of the key challenges (as defined as Issue 3) is to improve connectivity and to tackle traffic congestion. The related background paper provides useful context in terms of the range of interventions planned on the SRN which form part of the Government’s Road Investment Strategy – and some of the outstanding issues including that of peak hour congestion and the fact that incidents on the SRN impact on the local road network. It could be appropriate to note that in addition to congestion, key challenges could also include the following:</p> <ul style="list-style-type: none"> <li>· maintaining a safe road network</li> <li>· ensuring that requisite highways infrastructure is delivered in parallel with new development</li> <li>· maximising available infrastructure funding sources which may include public and private finance, as well effective use of S106, CIL or other developer funding.</li> </ul> <p>The Infrastructure Delivery Plan is clearly a key tool in this respect and it could be expected that the Plan will give a clear commitment to preparing an up to date IDP in parallel with the new Local Plan and to working with infrastructure providers in this matter.</p>	Noted

IC052/414	NFU	<p>Farms and rural businesses are totally reliant on car and HGV transport, there is no alternative. In order for these businesses to remain vibrant their needs must be taken into account when planning investment in the rural transport network.</p> <p>Tourism businesses also rely on access by private car and therefore it is important that new tourism enterprises are allowed to develop in locations other than those that are accessible by public transport.</p>	Noted
IC063/477	Judith Oppenheimer	<p>Lack of suitable public transport means that the majority people who visit the rural area for leisure and tourism do so by car. Absence of suitable car parking places forces people to pull in at gateways, on grass verges etc., this being one example of wear and tear on the environment. Suitable small car parks, parking bays and laybys need to be created at points of access to walking routes. Seats and picnic tables need to be provided at suitable locations on walking routes.</p> <p>Maps of walking routes in the rural area, with the locations of parking facilities, seats and picnic tables, need to be made available. (In the 1980s NuL published a series of booklets by George Riley on walks in the rural area. These are no longer available, not even in the County Library system.)</p>	Noted. The provision of picnic tables, seats and reference material for walkers is not a planning matter that can be addressed by the Joint Local Plan. The provision of parking facilities is a matter for the highway authority. Comments will be forwarded to Staffordshire County Council.
IC067/501	Christopher Preece	<p>Transport. The number of cars in use today is giving rise to many problems.</p> <ul style="list-style-type: none"> <li>• 1a) Parking on pavements causes damage and cost to repair.</li> <li>• 1b) It prevents pedestrian and disabled free access without using the road, safety issue.</li> <li>• 2) Traffic jams cause delays, inefficiencies and longer working hours.</li> <li>• 3) The large number of cars creates unacceptable pollution which costs lives and increased medical costs.</li> <li>• Proposals.</li> <li>• More bus lanes, to enable busses to run on time.</li> <li>• More buses to cover housing estates.</li> <li>• Encourage employers to employ people living close to employment.</li> </ul>	Noted
IC071/535	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>There is reference in the Housing issues paper to the high numbers of people commuting from rural areas within Staffordshire. However there is no attempt to address the fact that the situation will be further exacerbated if rural housing development is allowed to continue unabated and unless something is done to develop the rural economies through the provision of sustainable and appropriate rural employment opportunities.</p>	Noted - Different spatial options will have varying effects on transport issues.
IC072/562	Dean Lewis (Tim Dean)	<p>Dean Lewis Estates welcome the suggested policy approach set out in the I&amp;O of improving access and internal connectivity to enable better access to</p>	Noted - although this stage of the plan making process is to set out the key

		services, employment opportunities and housing. This approach should assist in alleviating traffic congestion on the strategic road network.	issues, challenges and demands on the area, rather than a plan of polices to address them.
IC07571	Steven Matthews	Ease traffic congestion by trying no traffic light junctions.	Detailed design and operation of junctions is not a matter for the Local Plan. Signals often included in design and operation of junctions for highway safety reasons

Transport Technical Paper				
Reference	Consultee Name	Section	Comments	Officer Comments
IC003/11	Stoke-on-Trent Public Protection	Pg 16 Transport Technical Paper	Section on Evidence from the Local Transport Plans. The last sentence of the first paragraph refers again to the Air Quality Management Area. It would be more informative to clarify that Air Quality has improved and that exceedances are limited to some major junctions and some congested roads.	Comment noted. Information such as this from the monitoring of the AQMA will be important for the development and monitoring of the Local Plan.
IC022/233	Joan Walley		The transport sections appear to not prioritise meeting air quality standards. Failure to do this will result in the area not being regarded as a desirable place for investment. Also there appears to be insufficient recognition of the importance of rail travel as an attraction for inward investment, as well as ignoring the potential impact of HS2 on future connectivity. There appears to be an assumption that future development will be drawn towards j 16 of the M6 with little regard to pressure on land along the	Comment noted. The Integrated Transport Strategy will be updated to support the emerging Local Plan, taking into account Air Quality Management Areas and the importance of rail travel. The DfT HS2 Phase 2b Command Paper welcomes the way Stoke-on-Trent City Council, Cheshire East and other partners are working together to ensure that the benefits of HS2 are maximised through the work in the Northern Gateway Partnership, and states that the Secretary of State is asking HS2 Ltd to take forward more detailed work on train planning for options to serve Stoke, and to look at Stoke-on-Trent to Birmingham connections.

			<p>northern part of the A500.</p> <p>Also there appears to be little collaboration with Rail North. That body is currently drawing up its investment plans, including for Manchester airport, and it is vital that our area connects with that. How is the local plan addressing that?</p>	<p>Both Stoke-on-Trent City Council and Staffordshire Council are members of the Rail North Association and Rail North Ltd. This enables evidence from the development of the local plan to be linked to the development of rail services by Rail North, for example making the case for connectivity with Manchester Airport, and additional calls by the Northern service at Longport. There are also four other franchises that serve Stoke-on-Trent. Also the City Council and Staffordshire County Council are working with the cross-LEP partnership Midlands Connect to develop the strongest possible case for strategic transport investment in the Midlands.</p>
IC042/361	Highways England		<p>It could be appropriate to note that in addition to congestion, key challenges could also include the following:</p> <ul style="list-style-type: none"> <li>Maintain a safe road network</li> <li>Ensuring that requisite highways infrastructure is delivered in parallel with new development</li> <li>Maximising available infrastructure funding sources which may include public and private finance, as well effective use of S.106, CIL or other developer funding.</li> </ul>	<p>Comment noted</p>
IC071/534	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)		<p>Loggerheads Bus Services (all times obtained from Google Bus Routes).</p> <p>1st bus to Newcastle (#164) 07:41, arriving at 8:10, every 60 mins, last bus 18:21 - not applicable if work starts at 8:00am.</p> <p>1st bus (#164) to Market Drayton 08:39, every 60 mins, last bus 19:19. Returns start at 09:06 until 18:06.</p> <p>The earliest you could arrive at Muller if you lived in Loggerheads and travelled on the bus would be 09:18. The outbound journey takes 40 mins. The return journey takes 59 minutes, last departure time from Muller 17:30.</p>	<p>Bus services are mainly commercial routes operated by private companies and local authorities have very limited resources to subsidise these services. The key issues of bus accessibility will be considered as part of the review of the Integrated Transport Strategy.</p>

			<p>The only direct bus to Stafford (#15 B) runs on a Thursday and Saturday only, leaving at 09:02, return bus leaving Stafford at 14:10. The only other way is to take a bus to Newcastle and change for Stafford, a trip of 1hr 40mins.</p> <p>A bus route to Nantwich takes 2hr 30 mins. It is almost impossible to commute from Loggerheads to any locality for work that starts at 8am. It's not possible to get to Muller for a 9am start and if you were working on shifts you would have to use own transport.</p> <p>The Transport Technical Paper and NULITS do not go far enough to explain specific improvements needed regarding the rural bus services, we expect that they will wait for the NP's to come in and re-assess the situation. If this was addressed it would provide a vital lifeline between the communities, especially for the young and elderly and also help to boost the rural economy as people would be able to access local shops and services, instead of commuting into the urban conurbations. It would also help to reduce the load on the infrastructure within the urban areas and improve opportunities in rural area.</p>	
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C075/572	Steven Matthews	All local bus companies could have joint bus day tickets. also use brownfield sites for new housing and maybe new businesses	The North Staffordshire Smart range of bus tickets, and PlusBus ass-on to rail tickets to/from Stoke-on-Trent railway station are multi-operator ticketing schemes.
IC082	North	Our ten-point criteria for a successful integrated public transport system, is	Noted

	Staffordshire Pensioners Convention	a benchmark for our work. To effectively integrate public transport modes for pedestrians, cyclists, bus and local train passengers, and taxi drivers, providing seamless travel attractive for commuters to leave their cars at home, North Staffordshire badly needs a long term central Government and regional agency funding commitment for a PTE transport organisation, even as the economic outlook for the UK is gloomy. We consider it necessary that we have a reliable and regular public transport system, with modern fleets of hybrid buses, and longer trains, connecting with all areas and operating from 5am to 11pm, police monitored and intimidation-free.	
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## Schedule of Comments – Health and Communities

Health and Communities – General Comments			
Reference	Consultee Name	Comments	Officer Comments
IC004/18	University Hospitals of North Midlands NHS Trust	The Trust considers the Health and Communities Issues are most important. Ensuring high quality living environments which are highly interconnected will positively influence health and bring communities together.	Comments noted. In accordance with the National Planning Policy Framework (NPPF) one of the key dimensions to achieving sustainable development is the planning systems social role, supporting strong, vibrant and healthy communities, by providing housing to meet the needs present and future generations, and create a high quality built environment. Issues and evidence about health and healthy communities will inform further stages of Joint Local Plan preparation.
IC009/89	Councillor Derek R Davies - NDP Steering Group	The local planning authority should work with the community and health organisations to understand and take account of the health, well-being and needs of the local population, including expected future changes. The planning system must play an important role in facilitating social interaction and creating healthy, inclusive communities. · Health of the community is dependent on the population, environment, housing, education, income and should encourage cross-sector collaboration to improve health and well-being in all its forms.	Comments noted. See also comments to IC004/18 above.
IC077/594	Andy Perkin (Potteries Heritage Society)	Much of this section concerns healthy lifestyles and the Society welcomes initiatives that will increase access, attractiveness and resources of open spaces and the local environment. However, there is not enough focus on community facilities, such as community & recreation centres, meeting spaces and shared community resources and the benefits these bring in terms of community cohesion.  As part of the overall strategy, the Plan should recognise the important contribution that can and has been made by community organisations, often as developers in their own right, and as part of the planning process as consultees, scrutineers of planning applications and instigators of neighbourhood plans.	Comments noted. Further evidence will be collected to understand community resources and facilities across the JLP areas as part of the infrastructure work which will support the JLP process.

IC079/605	Andy Perkin (on behalf of) Stoke Neighbourhood Forum	Much of this section concerns healthy lifestyles and the Society welcomes initiatives that will increase access, attractiveness and resources of open spaces and the local environment. However, there is not enough focus on community facilities, such as community & recreation centres, meeting spaces and shared community resources and the benefits these bring in terms of community cohesion. As part of the overall strategy, the Plan should recognise the important contribution that can and has been made by community organisations, often as developers in their own right, and as part of the planning process as consultees, scrutineers of planning applications and instigators of neighbourhood plans.	Comments noted. Further evidence will be collected to understand community resources and facilities across the JLP areas as part of the infrastructure work which will support the JLP process.
IC065/485	Maggie Taylor (Sport England)	This section needs to be clearly informed by the Playing Pitch Strategies and Built Facility assessments and Strategies for the Borough/City.	Comments noted. We will reference and take into account emerging evidence collected as part of the Play Pitch Strategy and Built facilities Strategy as we progress through the JLP process

### Health and Communities Introduction

Reference	Consultee Name	Comments	Officer Comments
IC065/487	Maggie Taylor (Sport England)	6.9 - This para. only refers to green infrastructure in relation to active lives - built sports facilities such as swimming pools, sports halls and artificial grass pitches are equally important and should be referenced in the Local Plan (as informed by the PPSs and BFSs referred to above.	Comments noted. We will reference and take into account emerging evidence collected as part of the Play Pitch Strategy and Built facilities Strategy as we progress through the Joint Local Plan process.

### Issue 1: Quality Environments

Reference	Consultee Name	Comments	Officer Comments
IC004/15	University Hospitals of North Midlands NHS	The University Hospitals of North Midlands NHS Trust fully supports the need for high quality environments that are well designed, connected and with a positive influence on health. The Trust supports this being achieved through	Comments noted. One of the strategic aims of the existing Joint Core Spatial Strategy is 'to protect and improve the



	Trust	better connected green spaces and improved cycle routes.	plan area's network of canals and watercourses, green spaces/ infrastructure and parks to provide the landscape setting for high quality development of homes, employment and leisure opportunities; opportunities for physical activity and to foster a more sustainable way of life.' The urban centres benefit from a network of formal and informal green spaces. Issues and evidence about the green infrastructure network and healthy communities will inform further stages of JLP preparation.
IC009/90	Councillor Derek R Davies - NDP Steering Group	<p>Planning policies and decisions should consider the effects of pollution, noise and adverse impacts on health and quality of life of the local community, especially adverse impacts arising from new development.</p> <ul style="list-style-type: none"> <li>· The local community through its Neighbourhood Development Plan should be able to identify special protection for areas of particular importance to them. By designating land as Local Green Space, the community should be able to control any new development in valued areas.</li> <li>· A sustainable community should be well connected with good transport services and communications linking people to jobs, schools, health and other services. New development should contribute positively to a healthy lifestyle and make adequate provision for all necessary community facilities, including public open spaces and recreational facilities.</li> <li>· An increase in sedentary commuting has been the result of a reduction in the use of public transport. By creating an accessible and walkable environment, investment in a cycling infrastructure and efficient public transport, encouragement would be given to active travel.</li> </ul>	Comments noted. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans can identify the range of landscapes, townscapes, green spaces, etc that define the areas within the Parish, and supported by appropriate evidence, set policies for sustainable development within the NP area. Issues and Evidence about pollution, noise and health will inform further stages of Joint Local Plan preparation.
IC011/156	Thistleberry Residents Association	6.12 The stated aims here appear to centre around good quality spaces, healthy eating, well maintained green spaces and good urban design. These should not merely be aspirational but actual and this is what this plan should produce during its lifetime. It is also important as stated that 'developments should contribute positively to health and not lower life expectancy or cause ill-health (6.10). It is also necessary that people are not exposed unnecessarily to noise and air pollution etc. in urban environments. This is particularly	Comments noted. Noise and air pollution (residential amenity) are well established considerations within environmental health, planning policy, and development management and will continue to be so. Green spaces are a component part of

		<p>pertinent in terms of housing next to infill sites etc. These are planning issues and must be addressed via the planning system. If not, then the Plan and the system are failing in their duty and stated intent.</p> <p>6.16 the issue of dense design needs to be addressed as does high rise building and the proliferation of premises of multiple occupation. It is not for the developer to dictate what goes where. At the moment in Newcastle in particular it would appear that a whole plethora of buildings recently given planning permission are, together with the ring road, forming an impermeable ring around Newcastle, mainly of bedsits.</p>	<p>sustainable communities. One of the strategic aims of the existing Joint Core Spatial Strategy is 'to protect and improve the plan area's network of canals and watercourses, green spaces/ infrastructure and parks to provide the landscape setting for high quality development of homes, employment and leisure opportunities; opportunities for physical activity and to foster a more sustainable way of life.'</p> <p>The urban centres benefit from a network of formal and informal green spaces. Issues and evidence about the green infrastructure network and healthy communities will inform further stages of Joint Local Plan preparation.</p> <p>The existing Core Spatial Strategy encourages higher density city centre living, and the opportunity to maximise the potential for town centre living in Newcastle Town Centre, primarily as part of higher density mixed use schemes designed to contribute positively to the character, vibrancy and sustainability of the town centre.</p> <p>Detailed design policies and density considerations will be addressed as the Joint Local Plan progresses. However there is an existing adopted Urban Design Supplementary Planning Document in place as part of the adopted Joint Core Spatial Strategy.</p>
IC012/175	Keele University	No specific comments although it is recognised that development planning has a positive role to play in the promotion of health and well-being. Consideration could be given to identifying current and potential sport and leisure facilities	Comments noted. The provision of sport and recreational facilities provides a positive role in the promotion of

		and how the approach to planning and development can link these to provide community benefit.	health and well-being for communities. The current and potential sport and leisure facilities will be referenced as we progress through the Local Plan process.
IC032/301	United Utilities	<p>United Utilities recommends the following text is included as part of the Council's proposed development management policies in relation to health, well-being and residential amenity:</p> <p>"The proposed development of sensitive uses (such as residential) adjacent to existing sources of pollution (e.g. noise, odour, traffic etc.) must demonstrate through the submission of appropriate impact assessments that there would be no detrimental impact on future residential amenity."</p> <p>In the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from existing operational sources of pollution such as noise and odour.</p>	Comments noted. Specific policies in relation to residential amenity will be developed as we progress through the JLP process. As part of the assessment of potential sites through the SHLAA process, amenity impacts are a key consideration. Where site specific information indicates that the development of a site would have an adverse impact of residents or adjoining sites uses, the site would be deemed unsuitable. The SHLAA is part of the evidence base that informs the development of the Joint Local Plan will consider the suitability with the potential conflicting uses.
IC034/316	Historic England	<p>Issue 1: Quality Environments Para 6.14 – The reference to engagement with the natural environment via the area's canals and green corridors is noted. However, the potential for engagement with the historic environment is also of relevance in this respect.</p>	Comments noted. The importance of historic environments in creating quality environments and engagement is considered as part of the heritage section of the Issues Paper. A key challenge of the Joint Local Plan will be to ensure that heritage assets have a positive impact on the environment of the area.
IC049/382	Woodland Trust	<p>We would like to see this section support the use of trees and woodland as a delivery tool for better mental and physical health and wellbeing, plus use of the Woodland Access Standard as a policy and delivery tool.</p> <p>In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that accessible woodland can assist in playing a key role in delivering improved health &amp; wellbeing at a local level through physical activity.</p>	Comments noted. The link between the natural environment and accessible green spaces (including woodlands), and improving people's health is acknowledged and identified in existing and emerging evidence documents including the respective green space strategies. Green Infrastructure issues

		<p>Although the relationship between the natural environment and health is a complex one, it is now widely accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.</p> <p>Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.</p>	and evidence will inform further stages of Joint Local Plan preparation.
IC064/478	Woodlands Trust	Access to green spaces is associated with better mental and physical health across socioeconomic groups.	Comment noted. See comment to IC049/382 above.
IC064//479	Woodlands Trust	Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision	Comment noted. Both councils have commissioned a green space strategy which will be undertaken in order to inform the JLP. See comment to IC049/382 above.
IC064/480	Woodlands Trust	<p>Trees and woodland offer multiple benefits for health and well-being as they provide areas for exercise; help to remove pollutants from the air and offer shading and evaporative cooling.</p> <p>12.38 Provision of quality open spaces (including trees and woodland) and recreation facilities can play an important role in encouraging healthy lifestyles and improving quality of health”.</p> <p>We would therefore like to see this Local Plan reference the Woodland Access Standard and support the role that trees and woodland can play in creating quality environments to support better health &amp; wellbeing.</p>	Comment noted. See comment to IC049/382 above.
IC065/486	Maggie Taylor (Sport England)	Sport England, in partnership with David Lock Associates has recently updated and published its 'Active Design' guidance ( <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a> ) which we would highly recommend the LP adopts the principles contained therein. The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to	Comment noted. This 'Active Design' guidance will be used to inform the development of the Joint Local Plan. The role of the planning system to create the right environment for people to lead active healthy lifestyles is acknowledged. Issues and evidence about such matters will inform further stages of Joint Local Plan preparation.

		create the right environment to help people get more active, more often. The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.	
IC070/516	Janet Simpson (Madeley Parish Council)	Madeley Parish Council would support the supplementary planning guidance re hot take away food as used by Stoke-on-Trent.	Support noted. The principles of the Hot Food Takeaway SPD will be considered in more detail as we progress through the Joint Local Plan process.
IC070/517	Janet Simpson (Madeley Parish Council)	The importance of layout and design of future developments having an impact on the health of a local community has been noted. A further aspect that needs to be explored is how the role of feeling safe where people live, work and study impacts on health and well-being. The role of local police and secure by design aspects need to be covered.	Comment noted. Improving the perceived safety of the environment and securing environments which deter crime is an important element of the Joint Local Plan. This will be considered and developed further as we progress through the JLP process.
IC071/545	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	Over the past 30+ years there has been a massive growth in the number of houses within the Loggerheads Parish along with an associated population increase. Throughout this period there has remained one constant; Ashley Surgery which has not increased its footprint. As a consequence there is insufficient capacity and many Loggerheads residents are forced to register with Market Drayton Primary Care Trust. Most patients have to wait in excess of 2 weeks for non-urgent Doctor Appointments. Indeed, where ailments deteriorate patients are forced to consider using A and E which puts unnecessary strain on hospital services. Additionally, because patients are being treated by Shropshire Health they are required to travel excessive distances for hospital appointments i.e. Oswestry for Orthopaedic care. All of this is compounded by poor public transport links. For the future, additional capacity is urgently required in the area, either by increasing the Ashley capacity or with an additional facility to service the Loggerheads community.	Comments noted. Loggerheads Parish is working on a Neighbourhood Plan (NP) which could include this type of development need within the NP area.

<b>Issue 2: Location of Development – Distance and Severance</b>			
<b>Reference</b>	<b>Consultee Name</b>	<b>Comments</b>	<b>Officer Comments</b>
IC027/269	Keele Parish Council	Community facilities are an important part of maintaining health, particularly in an ageing population, and we are concerned that insufficient consideration is given in the plan to the development of services and facilities in rural areas to support social interaction.	Comment noted. Community facilities, in both rural and urban setting will be considered further as the Joint Local Plan progresses.
IC065/488	Maggie Taylor (Sport England)	6.19 Key Challenge - text focusses on new development to be well linked up with existing infrastructure/facilities but equally new infrastructure (for example a new school with a sports hall or a new sports venue (to meet current deficits or needs arising from new development) equally needs to ensure it is well linked to new and existing development?	Comment noted.

<b>Issue 3: Infrastructure</b>			
<b>Reference</b>	<b>Consultee Name</b>	<b>Comments</b>	<b>Officer Comments</b>
ICO34/317	Historic England	Issue 3: Infrastructure Para 6.20 – The last sentence refers to development opportunities around canals to encourage active travel. Again, such opportunities would also offer engagement with, and appreciation of, the historic environment too.	Comments noted. The importance of historic environments in creating quality environments and engagement is considered as part of the heritage section of the Issues Paper. A key challenge of the Joint Local Plan will be to ensure that heritage assets have a positive impact on the environment of the area.
IC040/353	Gordon Lancaster - Madeley Conservation Group	Public parks and green spaces are essential for both health and communities and absolutely must not be sold off to alleviate present funding shortages since they are simply not replaceable, even if or when the local economy and funding improve. Other outgoings, although equally beneficial, can be restarted in better times. Amid the extensive and expensive areas of new paving in Hanley, there are few if any trees. Trees not only soften the hard outlines of modern buildings and induce a sense of calm and well-being, but they absorb carbon dioxide and particulates, give off oxygen, absorb excess rainfall, cool and air by evaporation, and provide shade. Very good value for money.	Comments noted. The assessment of public parks and green spaces will inform the draft Joint Local Plan. This will provide a robust basis in which to understand the qualitative and quantitative need for greenspace across the plan area. The ability of greenspaces to mitigate the effects of climate change is acknowledged. Green infrastructure issues will inform further stages of Local Plan

			preparation.
IC042/362	Highways England	The infrastructure delivery plan is clearly a key tool in this respect and it could be expected that the Plan will give a clear commitment to preparing an up to date IDP in parallel with the new Local Plan and to working with infrastructure providers in this matter.	Noted. An Infrastructure Delivery Plan will be produced as the Joint Local Plan progresses.
IC049/382	Woodland Trust	<p>We would like to see this section support the use of trees and woodland as a delivery tool for better mental and physical health and wellbeing, plus use of the Woodland Access Standard as a policy and delivery tool.</p> <p>In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that accessible woodland can assist in playing a key role in delivering improved health &amp; wellbeing at a local level through physical activity.</p> <p>Although the relationship between the natural environment and health is a complex one, it is now widely accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.</p> <p>Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.</p>	Comments noted. See also response to IC049/382
IC065/482	Maggie Taylor (Sport England)	If housing growth is of such a level that it may require new schools then this needs to be identified up front and sites identified for such schools. At present in Stoke the BSF programme has provided several new school/academies which may include some 'capacity' for growth but equally some 'surplus' school sites are being considered for 'disposal' and redevelopment. Perhaps these sites need to be retained for new schools? Site allocations, site disposals, co-location and multifunctional sites really need to be considered in the round to ensure land use/public services can be provided in the most efficient and sustainable way, especially where viability is such a key factor. Knowing the infrastructure requirements early and planning for them is therefore more critical. New schools, especially secondary, also give the opportunity for shared community facilities such as sports halls which can both provide for curriculum sport as well as community sport so making the best of capital investment from education budgets as S106/CIL top up funding to ensure such facilities are of a high quality and big enough for public usage (e.g. have a reception area). The Local Plan needs to explicitly look to maximise co-	Comments Noted. Providing sufficient local facilities such as schools to meet higher housing need has been identified as one of the issues in the Issues consultation. As the Local Plan progresses, evidence and issues of housing need/growth and site allocations would inform where need is likely to occur for infrastructure/community facilities, e.g. schools and health centres. Such evidence will inform further stages of Joint Local Plan preparation.

		location and economies of scale to give the Borough/City its best chance of securing community infrastructure to serve the planned growth levels.	
IC065/483	Maggie Taylor (Sport England)	Key Challenges remain around deficits in current sporting infrastructure which need to be addressed as well as that arising from new development? Should this be incorporated into the plan - the draft Playing Pitch Strategy and Built Facility Strategy for Stoke are indicative of this being an issue and there is a shortfall of swimming provision in Newcastle as identified through the review of the immanent impact of Kildgrove Leisure Centre closure?	Comment noted. The Playing Pitch Strategy and Built Facility Strategy will inform the development of the Local Plan. Newcastle's emerging Playing Pitch; and Sports and Active Lifestyles Strategies will contribute to evidence on the issue of sports facilities within Newcastle Borough will inform further stages of Joint Local Plan preparation.
IC065/489	Maggie Taylor (Sport England)	In addition to the PPS and BFS Stoke City Council has also recently adopted their Physical Activity Strategy which identifies barriers to why residents don't engage in physical activity as much as they should etc. and the recommendations from this study would be usefully referenced here and in this section generally. The Vision, key aims and objectives from the PAS are - By 2020, Stoke-on-Trent will be a city renowned for physical activity and sport where people are inspired and motivated to lead active and healthy lives. City Wide Priorities: <ul style="list-style-type: none"> <li>• An Active City: With the right environment to achieve a step-change in behaviours so that more people choose to live active lifestyles.</li> <li>• A Destination City: With a thriving economy and an excellent infrastructure that underpins our active, sporting culture and cements our reputation as a leading destination for events, tourism, elite sport and sports related business.</li> <li>• A Healthy City: Where physical activity and sport are integral to helping improve peoples' health, well-being and resilience.</li> <li>• A Safer, Stronger and More Skilled City: With a skilled and confident sector workforce and a commitment to harnessing the unique power of physical activity and sport to inspire people to achieve, learn, volunteer and connect with their communities.</li> </ul>	Comment noted - The strategy will be reviewed alongside discussion on how planning can influence physical activity participation during the development of the Joint Local Plan.
IC065/490	Maggie Taylor (Sport England)	The key challenges need to incorporate built sports infrastructure and other outdoor sports as well as green space and playing pitches. co-location and jointly provided community infrastructure and securing community use of schools can also be part of the solution and should be encouraged.	Comment noted. See also response to IC065/483 above.
IC067/500	Christopher Preece	Should consider the surrounding area not just the development plot. The impact on adjacent land and services must be part of the development, At	One of the benefits of HIAs is that they should take into account other



		present we have in Stoke-on Trent a jumble of individual projects. New development sites should have access to a full range of facilities proportional to the size of development.	developments.
IC067/502	Christopher Preece	As houses and flats are built with smaller gardens and space. Also large gardens are being built on. Open space must be provided in each community for children to play and outdoor space for public functions. Sports areas need to be designated as open space now as in the capital (London). Misuse and vandalism needs to be dealt with as a serious offence.	Comments noted. The assessment of public parks and green spaces will inform the draft Joint Local Plan. This will provide a robust basis in which to understand the qualitative and quantitative need for greenspace across the plan area. Vandalism of areas cannot be dealt with through the planning system however improving the perceived safety of the environment and securing the design of developments which deter crime is an important element of the Joint Local Plan. This will be considered and developed further as we progress through the JLP process.
IC069/510	Neil Dawson	Encourage community green space partnerships.	Noted. The Greenspace Strategies which are being commissioned at each authority will incorporate consultation with local groups and partnerships. Community green space partnerships are recognised as opportunities for people to demonstrate shared values and community pride in looking after their local greenspaces or public realm. Whilst the planning system has a role to play in planning for quality places it has little control over their maintenance. These spaces encourage cohesive, inclusive and active communities and were covered in Issue 4 of the Issues Paper.
IC071/546	Karen Watkins (Loggerheads Parish Council &	Loggerheads currently has one football pitch, located in the Burntwood, and no other sporting facilities available outside school hours. According to NULBC Playing Pitch Strategy (PPS) this pitch is a, "standard quality adult pitch with	Comment noted. This has been identified as a need within the draft Loggerheads Neighbourhood Plan. The

	Neighbourhood Plan Working Group)	<p>minimal spare capacity. Pitch is minimum size and is not serviced by changing rooms". This statement is wrong. The pitch measures 93 yards by 60 yards. The FA dictates that a pitch must be between 100 and 120 yards long, for this reason the local team has to play home matches at Eccleshall football club. Hardly encouraging an active community. In addition, parents are reticent to allow children to play on the pitch as it is remote, in local woods. Because of this remoteness there have been instances where used syringes have been found around the pitch. With regard to comments in PPS to spare capacity a minimum sized FA standard pitch needs 6100sq yds to be viable or 1.26 acres. The total space available in the Burntwood site is 7211sq yards or 1.49 acres, this hardly constitutes spare capacity.</p> <p>Loggerheads needs a clear and coherent policy for future health and wellbeing. NPPF refers to Open Space Policy guidance, this policy is expressed by Fields In Trust or FIT. They refer to the 6 Acre Standard, which basically says there should be 6 acres of open space per 1000 people. This is then further refined to say, that within the 6 acres, there should be 3 acres of sports fields per 1000 people. For Loggerheads with a population of over 2800 that is in excess of 8 acres of sport pitches not the current 1.49. Indeed, we should be looking to the future and anticipate population growth, which is inevitable, and not react over 30 years too late. Indeed, another bullet point from the new policy says, "Government want health, leisure and sport to continue working closely together to fight inactivity across the country".</p> <p>As a priority "Local Government", in this case Newcastle under Lyme Borough Council needs to address the dire facilities available to the Loggerheads Parish residents. Land needs to set aside that is fit for the Governments new strategy; this should take priority over housing development. Along with open space and sports facilities it should include a community facility that includes medical health care.</p>	NPPF in paragraphs 73 and 74 identifies the need for high quality open spaces and opportunities for sport and recreation, as an important contribution to the health and well-being of communities. Issues and evidence in concerning open spaces, green infrastructure and sport and recreation will inform further stages of Joint Local Plan preparation.
IC080/614	Nicky Davis	<p>Access to the natural environment is good for health and well being of residents. I would like to see further enhancement of these. Very good improvements have been made in Trentham with the greenway but it would be good to carry on improvements, for example the path beside Longton Brook. Also, I have not had time to read the over 90 page document fully but it seems more could be made in terms of assets of community value and how these relate to green spaces.</p>	Comments noted. The assessment of public parks and green spaces will inform the draft Joint Local Plan. This will provide a robust basis in which to understand the qualitative and quantitative need for greenspace across the plan area.

Issue 4: Cohesive, Inclusive and Active Communities			
Reference	Consultee Name	Comments	Officer Comments
IC009/91	Councillor Derek R Davies - NDP Steering Group	<p>With an ageing population, local communities should take active steps to increase the availability of National Health services, pharmacy and demand a reduction of hospital waiting times.</p> <ul style="list-style-type: none"> <li>· Local communities should be able to demand and give greater consideration to Age Friendly Housing.</li> <li>· Encourage a sense of well-being in the community by ensuring that any future developments promote a feeling of belonging and provide an opportunity for recreation and social interaction, thus reducing isolation.</li> <li>· Support should be given to community projects, activities for the elderly and local involvement. This should include the members of the local school, businesses, churches, village halls, pubs and restaurants. The younger age groups of singles and families are moving out of rural areas due to a lack of affordable houses and unsuitable training and employment opportunities. These groups are being replaced by more affluent, older families moving in from urban areas.</li> <li>· Our community is supported by three Parish Councils, regular news sheets, church magazines, Neighbourhood Development Plan Steering Committee and active village halls.</li> </ul>	Comment noted - The Joint Local Plan will seek to deliver different types of housing to address local needs and aspirations.
IC049/383	Woodland Trust	<p>We support the role that community woodland can bring to supporting vibrant and inclusive local communities.</p> <p>The case for community woodland is supported by the Urban Forestry and Woodlands Advisory Committee (FWAC) in their new publication 'Our vision for a resilient urban forest' (Urban FWAC Network, Feb 2016) – "Tree planting can help build a collective community spirit and pride. It may also generate cost savings and long term stewardship beyond planting".</p> <p>As an example of community woodland in practice, the Woodland Trust has worked with Stoke-on-Trent City Council to create two new community woods – see attached case study.</p> <p>We would therefore like to see this Local Plan support community woodland.</p>	Comment noted.
IC065/491	Maggie Taylor (Sport England)	New locally provided community provision (schools, libraries, health surgeries, sports facilities can be provided in co-located venues if they are properly	Comment noted - The provision of infrastructure to support new

		planned and managed with inherent cost savings etc. This could be key re. viability issues	developments will be explored as we progress through the Joint Local Plan process. See also response to IC065/483.
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Health Technical Paper				
Reference	Consultee Name	Section	Comments	Officer Comments
IC003	Stoke-on-Trent Public Protection	Section 6	<p>Given that air pollution is a topic of national interest and improving the UK's air quality is moving up the political agenda, more emphasis on the importance of actions to improve air quality and to control and prevent pollution to create cleaner, healthier air for all should be referred to.</p> <p>The health impacts of poor air quality are often reported upon with alarming statistics being put forward. For example, in a recent report by the Royal College of Physicians and the Royal College of Paediatrics and Child Health it is estimated that 40,000 people die in the UK each year as a result of nitrogen dioxide and particulate matter pollution. A Public Health England report, published in April 2014, entitled 'Estimating Local Mortality Burdens associated with Particulate Air Pollution', suggests that current levels of particulate air pollution have a considerable impact on public health and the life expectancy of the population. The estimated number of life-years lost for the West Midlands population due to increased mortality risk attributable long-term exposure to particulate air pollution is 29, 897.</p> <p>It is recognised that some of the success in improving air quality involves life style changes and personal commitment to live, work and travel in</p>	Comment noted - this will be further explored in the Strategic Options paper. The Healthy Urban Planning Officer and Air Quality Officer are working closely together on this area.

			<p>different ways. There is on-going support for the principles to encourage less car usage, to reduce congestion and hence improve air quality. Where possible the authority continues to contribute to education, travel plans, emissions reduction, the promotion of walking, cycling and the use of public transport.</p>	
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## Schedule of Comments – Heritage

Heritage – General Issues/ Comments			
Reference	Consultee Name	Comments	Officer Comments
IC009/92	Councillor Derek R Davies - NDP Steering Group	SoT has failed to reinvent itself following industrial and economic decline. So long as SoT clings to its 'industrial past' it will not make the hard choices that will allow it to pull itself out of its current state of dereliction, move forward and attract new business and new population. In the past, cities that have failed to reinvent themselves in the face of change have suffered terminal decline and eventual desertion. SoT cannot continue to live in the past. It has a choice to move forward into the future or to die.	The comments relate to the economic strategy to be pursued by the Joint Local Plan. This will begin to be established at the Strategic Options stage and will continue to be refined through the subsequent plan preparation stages. The historic importance of the plan area and the heritage assets that exist within it will be considered as part of the overall plan strategy.
IC009/102	Councillor Derek R Davies - NDP Steering Group	The rural area as a landscape, natural and historical heritage asset belongs to the whole borough and its residents, not just to the rural population and its landowners – at whose expense it is maintained. While the rural area has an obvious and vital economic role through the extractive industries of agriculture, forestry and mineral extraction and opportunities for rural-based business, the rural area as heritage asset has a major economic contribution to make in terms of: <ul style="list-style-type: none"> <li>· both local and inward tourism</li> <li>· holidaying</li> <li>· land-based rural sports such as fishing, shooting and horse riding.</li> </ul> It makes a further contribution in terms of the promotion of health and well-being through leisure activities such as walking, cycling and the study and appreciation of the natural environment and its biodiversity; and through educational opportunities. All of these activities too can render an economic return.	Evidence within the Economic Technical Paper demonstrates that tourism is performing well in the local economy. Furthermore many organisations involved in business growth recognise that high quality jobs based around tourism and leisure interests are important to the local economy and that action is being taken to target this key sector for growth.
IC009/104	Councillor Derek R Davies - NDP Steering Group	para.7.11 Designated conservation areas need to be accessible to the public and to be put to work to 'add value', otherwise their designation is redundant. p.66 'Heritage is often seen as a barrier to development'. Heritage is a barrier to development when it is not properly identified and understood.	Issue 1: 'Importance of heritage assets' draws attention to the need to keep information on heritage assets up to date as this can help determine and assess the significance of heritage assets and the contribution they make to the area. The programme of conservation area appraisals and management plans managed by both authorities is central to this as well as the records

			kept in respect of buildings of local historical and architectural interest. Conservation Area Appraisals take account of the accessibility of these designated areas to the general public.
IC009/107	Councillor Derek R Davies - NDP Steering Group	Paragraph 157 of the NPPF states that the Local Plan should “identify land where development would be inappropriate, for instance because of its environmental or historic significance” and “contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified”. There is no mention of this in the Issues consultation paper.	The Introduction to the Issues Consultation Document explains that the consultation exercise aims to set out the most important issues identified from the evidence. Paragraph 1.26 further explains that the policy background is set out in a series of technical papers. This is also explained at the beginning of each topic chapter. The Heritage Technical Paper identifies what the Local Planning authority is required to do by national planning policy and describes paragraph 157 of the NPPF.
IC009/108	Councillor Derek R Davies - NDP Steering Group	The NPPF also requires “local planning authorities to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in future. Local planning authorities should therefore either maintain or have access to a historic environment record. It also identifies that where appropriate; landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity”. There is no mention of this in the Issues consultation paper	Paragraph 1.11 of the supporting Heritage Technical Paper refers to these requirements of the National Planning Policy Framework.
IC009/110	Councillor Derek R Davies - NDP Steering Group	It is recognised in the supporting Heritage technical paper that neither council has a detailed historic environment characterisation study but there is no mention of this being addressed, or an issue in the Issues consultation paper.	The NPPF is clear on the need for proportionate evidence to support the preparation of a Local Plan. A detailed historic environment characterisation study is desirable but a decision to commission such a study will be taken once the range of growth options has been developed. A programme of conservation area appraisals and management plans is well underway and these are an important source of information on the area’s historic character, albeit mainly focussing on the built environment. There is also broad Historic Land Classification information available for the whole conurbation which will be used as part of the supporting evidence to inform the preparation of

			the Joint Local Plan.
IC009/111	Councillor Derek R Davies - NDP Steering Group	There is no mention of railway heritage and the opportunity to reopen local lines as a means of stimulating tourism and supporting the local transport infrastructure, which itself is recognised as a weakness elsewhere in the Issues consultation paper	The opening up of disused railway lines may be addressed in the Strategic Options and/or the Draft Local Plan, but only where there is evidence that such a proposal would be needed and is feasible.
IC011/159	Thistleberry Residents Association	Given that Newcastle and possibly Stoke could be reliant on tourism and leisure in the very near future, the key messages in this Plan re heritage are both weak and vague to the point where developers are probably rubbing their hands with glee at the prospect of getting rid of the rest of it – much of it has already gone. We would like our ancient trackway preserved and the old toll road bridge parapet wall replaced to match its partner opposite - which is being left to gradually deteriorate.	The consultation document and technical papers identify that tourism and leisure is an important employment sector, which is being targeted for growth by the Staffordshire and Stoke-on-Trent LEP. However, the Joint Employment Land Review is clear that the future of the plan area's economy is not reliant upon tourism and leisure. The Issues Consultation document is clear in paragraph 7.15 that the Joint Local Plan will recognise, safeguard and integrate the historic environment as part of a plan-led approach. Furthermore, Issue 1 in the Heritage chapter of the Issues Consultation Document relates specifically to the importance of heritage assets. This is therefore an area that Joint Local Plan will seek to address.
IC012/176	Keele University	As noted as a challenge at page 66, heritage issues can be seen, with or without justification, as a barrier to development. It is right that the promoters of development should, where necessary, be required to demonstrate that heritage issues have been properly taken into account in the development process. Similarly, objectors arguing alleged harm to heritage assets as a justification for opposition to otherwise acceptable development need to provide clear and specific evidence of harm rather than general heritage-based opposition.	Noted. The potential for a balanced policy approach in regard to the protection of heritage assets will be explored at the Draft Local Plan stage.
ICO34/318	Historic England	Para 7.15 – The approach of the Joint Local Plan to the consideration of the historic environment set out in this paragraph is welcomed	Supporting comment noted.
IC048/377	Newcastle-under-Lyme Civic Centre	Within the Heritage section of the JLP the background is both detailed and informative but only serves to underline how the decline of the three major historic industries has impacted upon the current environment. Whilst it is encouraging that certain institutions and commercial enterprises are keeping this heritage alive it is our concern that others, such as Etruria industrial	Whilst the Local Plan, as a land use document, cannot directly influence or control the management of heritage assets such as Etruria industrial museum, it can support the development and expansion of such facilities. Potential policy responses to support the future prosperity of such



		Museum, have closed. The Society trusts that the JLP will look to address our concerns regarding this aspect in the light of the statements made in paragraphs 7.14 and 7,15 of the JLP	institutions could be explored at the Draft Local Plan stage. We welcome further engagement from Newcastle-under-Lyme Civic Centre in further stages of JLP preparation.
IC048/378	Newcastle-under-Lyme Civic Centre	People's concerns re heritage in both Newcastle-under-Lyme and Stoke-on-Trent might be addressed if the Heritage Section contained a little more detail and was less ambiguous particularly where clearly subjective assessments are involved.	The Issues Consultation Document and the supporting technical papers present relevant planning issues and challenges based on facts and evidence that were known at the time the documents were prepared. This is just the starting point for the Joint Local Plan preparation process. More detailed exploration of planning issues and appropriate policy responses will be explored later in the plan preparation process, particularly from the Draft Local Plan stage onwards.
IC063/452	Judith Oppenheimer	Both the Heritage section of the Issues Consultation paper and the technical paper focus almost exclusively on the issue of Stoke on Trent's 'industrial heritage' and on the built environment. Planning is concerned with the use of land, not purely with buildings. The Heritage Lottery Fund, as one of the country's major heritage organisations, is very clear that heritage also concerns the land and natural environment. The Issues Consultation paper and the technical paper pay all too little attention to the land, landscape and natural heritage of the rural areas covered by the Plan	The Introduction to the Heritage chapter section 7.14 makes it clear that the historic environment is made up of landscapes, townscapes, buildings and archaeology. The character of the landscape is considered in the Natural Environment chapter and this includes many references to the areas natural heritage e.g. designated sites, wetland habitats, ancient woodlands etc. The links between heritage and urban/rural landscapes will be considered further as the plan preparation process continues to progress.
IC063/460	Judith Oppenheimer	para.7.11 Designated conservation areas need to be accessible to the public and to be put to work to 'add value', otherwise their designation is redundant.	Conservation Area Appraisals take account of the accessibility of these designated areas to the general public. These will be used to inform the preparation of relevant policies in the Joint Local Plan.
IC077/595	Andy Perkin (Potteries Heritage Society)	Much of this section is devoted to raising the profile of our local heritage, the need recognise the wealth and contribution it can make and the problems of heritage being seen as a barrier to development. More could be made of the golden opportunity to take advantage of heritage-led regeneration in North Staffordshire, as some recent cases have demonstrated great success in both delivering development funding and raising the areas profile nationally.	Noted. Heritage-led regeneration will be considered alongside other relevant priorities when the strategic aims, objectives and overall strategy of the plan are being developed.

IC079/606	Andy Perkin (on behalf of) Stoke Neighbourhood Forum	Much of this section is devoted to raising the profile of our local heritage, the need recognise the wealth and contribution it can make and the problems of heritage being seen as a barrier to development. More could be made of the golden opportunity to take advantage of heritage-led regeneration in North Staffordshire, as some recent cases have demonstrated great success in both delivering development funding and raising the areas profile nationally.	Noted. Heritage-led regeneration will be considered alongside other relevant priorities when the strategic aims, objectives and overall strategy of the plan are being developed.
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### Issue 1: The Importance of Heritage Assets

Reference	Consultee Name	Comments	Officer Comments
IC005/30	St Modwens	<p>It is generally agreed that heritage assets provide significant value to an area and are often unique and should be retained where possible. It is however considered that where a heritage asset presents a significant barrier to any viable form of redevelopment then there needs to be flexibility within Councils' approach to development proposals. The vital next step is to appraise the current heritage assets within the area in order to establish which are of the highest value and worthy of retention.</p> <p>6.2 As mentioned previously, due to remediation costs of redeveloping brownfield land, and the relatively low value of the housing market, the heritage assets at the Wades Site have made redevelopment incorporating their retention completely unviable. It is therefore strongly recommended that alternative redevelopment options to the retention of lower-value heritage assets are considered. Where it can be demonstrated that the re-use / conversion of heritage assets is not viable, demolition, in whole or part should be allowed and redevelopment permitted to the use and design standards appropriate to the locality, whilst ensuring deliverability is maintained and supports the local economic regeneration. Where appropriate, the design of new buildings could reflect the former assets, or include the provision of new interest that will become assets over time, or another means. It needs to be recognised that heritage is not just "seen" as a barrier, but experience and practise has shown that the economic reality is that</p>	The Joint Local Plan will have to give detailed consideration to balancing the need to protect and enhance the local heritage with development viability. Both councils will draw from relevant evidence such as viability studies and information contained in the respective Historic Environment Records to determine how policies can respond to this challenge in a positive way.

		<p>it can be a barrier to development.</p> <p>6.3 Without an overarching vision or aim for the joint authority area it is not possible to properly attach weight to the protection of heritage assets, as their value needs to be weighed against development potential, and long-term investment that could be secured through redevelopment.</p>	
IC009/93	Councillor Derek R Davies - NDP Steering Group	<p>SoT needs to make hard decisions about its 'heritage' and to identify the real jewels in its crown so as to</p> <p>(1) get its heritage and cultural offer right and</p> <p>(2) enable badly needed business/commercial and residential redevelopment of areas surrounding identified islands of heritage and culture.</p> <p>Museum curators continually have to make choices because they know that museums cannot keep every old or historical object that is offered to them, and that everything that is old does not have cultural or historical value.</p> <p>SoT likewise has to make choices about its built environment. It also needs to make choices that remedy the unrelieved industrial blight and 'Detroitness' of SoT. Above all, it needs to recognise that 'legacy' is not the same as 'heritage'. SoT's industrial legacy is a millstone round its neck. SoT needs to distinguish between the majority of its legacy, which needs to be swept away so that the city can reinvent itself, and the jewels that are its heritage.</p> <p>The jewels in SoT's crown are:</p> <ul style="list-style-type: none"> <li>· The canal and opportunities for waterside living and leisure</li> <li>· City Museum and Art Gallery, including Staffordshire Hoard, Gladstone Pottery</li> <li>· Hanley Park</li> <li>· Wedgwood Museum</li> <li>· Ford Hall</li> <li>· Ready access to Moorlands and Peak District countryside</li> </ul>	<p>Both councils and other organisations such as Historic England maintain extensive evidence about the value and condition of heritage assets in the plan area. Such evidential information is presented in the Heritage Technical Paper. The most important heritage assets are protected by statutory and local designations, such as conservation areas, listed buildings and scheduled ancient monuments. Both councils will draw from relevant evidence and information about heritage as well as evidence regarding the viability of development to determine how policies can balance the need to preserve heritage whilst encouraging appropriate development.</p>
IC011/157	Thistleberry Residents Association	<p>We would like to think that heritage in this area is important since it could be one of the few assets that this area possesses, together with its green spaces, that could keep it afloat. There needs to be a more imaginative approach to heritage other than removing it and demolishing buildings, simply because developers want a clean canvas</p>	<p>The importance of heritage is recognised in both national planning policy and the Issues Consultation Document. The Joint Local Plan will have to give detailed consideration to balancing the need to protect and enhance the local heritage with development viability.</p>
IC034/319	Historic England	Issue 1: Importance of heritage assets – Paragraph 7.16	Issue 1 deliberately focuses directly on heritage

		<p>misinterprets the NPPF policy relating to significance of heritage assets and this paragraph should be amended. Would there be any opportunity to include the production of/update of Conservation Area Management Plans as part of the local historic evidence base?</p> <p>The key challenge for Issue 1 refers to 'historic assets'. This should be revised to read 'historic environment and heritage assets, and their settings' in line with NPPF terminology.</p>	<p>assets, as evidence presented in the technical paper has shown that there is a particular issue within the plan area in regard to heritage assets being degraded or coming under pressure from development. Issues 3 &amp; 4 deal with issues specifically relevant to the historic environment and the setting of heritage assets. In both local authority areas a programme of conservation area appraisals and management plans is underway and these will provide an important source of information on the borough's historic character to inform the Joint Local Plan policies.</p>
IC040/354	Gordon Lancaster - Madeley Conservation Group	<p>While it is not sensible to retain for example some Victorian buildings which are no longer fit for any modern purpose, there are many buildings of particular distinction in parts of the City such as Longton. If eventually these could be reused with facades preserved and renovated, the result in terms of appeal to investors and public morale would be quite strong.</p>	<p>This is a detailed matter relating to design and heritage policy. Whether or not it is appropriate to include a policy supporting redevelopment of older buildings with retention of facades will be determined in the Draft Local Plan.</p>
IC048/379	Newcastle-under-Lyme Civic Centre	<p>The Society considers that not enough importance is currently attached to the value of our assets and the way in which, through encouraging tourism, they can bring benefit to the whole area. The local Inland waterways and their associated historic buildings are one such lost opportunity in comparison with other cities. Generally our back is turned on these potential tourist attractions. Old buildings etc. should not be equated with 'old fashioned'. And 'nedmodern' does not necessarily mean 'better' or 'more progressive'.</p>	<p>The Trent and Mersey canal, Shropshire Union canal and Caldon canal are designated as conservation areas in recognition of their historic significance and value. Each of these designated areas are subject to review and appraisal to determine their quality and how they are functioning. The City Council has also prepared a Canal Management Strategy and a Canal Opportunities Study which examine how the relationship between the canals and surrounding areas can be made the most of. Such evidence documents will help to inform the preparation of the Joint Local Plan and detailed policies related to heritage and design will be explored at the Draft Plan stage.</p>
IC054/420	Angela Lee	<p>Welcome comments regarding heritage and its importance in future plans. Would like see more detail of what is considered as heritage - not just individual buildings but areas which might not be conservation area but have local character and heritage value. Heritage doesn't just have to be very old things, although they are</p>	<p>Noted. The need to draw from evidence contained in Historic Characterisation studies will be considered. The Historic Environment Record for each area will also be used to inform the Joint Local Plan. Whether or not it is appropriate to apply</p>

		irreplaceable.	policies for non-designated area based heritage will be explored at the Draft Local Plan stage.
IC063/454	Judith Oppenheimer	SoT needs to make hard decisions about its 'heritage' and to identify the real jewels in its crown so as to (1) get its heritage and cultural offer right and (2) enable badly needed business/commercial and residential redevelopment of areas surrounding identified islands of heritage and culture.	The most important heritage assets are protected by statutory and local designations, such as conservation areas, listed buildings and scheduled ancient monuments. Both councils will draw from relevant evidence and information about heritage, such as the historic environment record, to determine how heritage assets can also deliver wider benefits such as economic growth.
IC063/455	Judith Oppenheimer	SoT needs to be clear about the definition and identification of 'heritage assets' and about the current detrimental influence of its industrial legacy on the city's prospects	'Heritage asset' is defined in national planning policy as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest" and that "Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)". This definition is recognised by both councils and it is also included in the Glossary in chapter 11 of the Issues Consultation Document. Heritage assets that fall within this definition are referred to in the background section and paragraph 7.16 in the Heritage chapter of the Issues Consultation Document. They are also identified in more detail in the Heritage Technical Paper. 'Industrial legacy' is a matter that is distinct from the definition and identification of heritage assets, although the second key challenge under Issue 1 identifies that heritage assets can have a positive impact on the environment of an area. Policy approaches to address this key challenge will be explored at the Draft Plan stage.
IC063/457	Judith Oppenheimer	While NuL still has a street market, it has lost its identity as a market town since the closing of its livestock market. A succession of poor planning decisions from the late 1960s onwards have resulted in the as-yet unhalted decline of the town centre. The tackiness of the town centre, its shop fronts and poor-quality	The background to the Heritage chapter suggests that the relationship between the urban and rural area may have been weakened by the fact that the town no longer has a cattle market. Newcastle is still an active market town despite the loss of its

		<p>developments such as 1 London Road detract seriously from the aspect of a once-prosperous town centre. Appearances make it difficult to believe that the town centre is actually a conservation area.</p> <p>NuL could be attractive and prosperous again. NuL needs to look carefully at its architectural, cultural and historical heritage. Like SoT, it needs to distinguish between legacy and heritage. Eyesores such as the Zanzibar need to be demolished.</p>	<p>livestock market. Newcastle's market town heritage remains an important part of the town's identity. The Newcastle Town Centre is doing well with only a 10.4% vacancy rate compared to 12.4% nationally with new independent businesses, especially food and drink, are choosing Newcastle as their preferred location. The authorities have a duty to protect both designated and non-designated heritage assets, but places change and evolve over time and conservation legislation accounts for that. Consumer shopping habits also change, and online shopping is an increasing trend, a matter which the planning system has no control over, and that too affects town centres. Seeking good standards of design and amenity is one of the core planning principles in the National Planning Policy Framework, and this is also covered in the Joint Core Spatial Strategy, and other joint and area based Supplementary Planning Documents or Guidance. The programme of conservation area appraisals and management plans managed by both authorities is central to this as well as the records kept in respect of buildings of local historical and architectural interest. The Newcastle Town Centre Conservation Area encompasses the core of the historic market town, with some 51 listed buildings. The High Street retains its open-wide market place and an almost daily market, the townscape is generally of a high quality. To retain and improve the quality of the town centre existing policy is supported by the Shopfront Design Planning Practice Guidance Note, Joint Stoke and Newcastle Design Guide SPD, and Newcastle-under-Lyme Town Centre SPD; along with various Conservation Area appraisals. This evidence will inform further stages of Joint Local Plan preparation.</p>
IC063/459	Judith	Prior to their growth and development the urban areas of NuL and	Duplicates comment 63. The landscape of the

	Oppenheimer	SoT comprised a rich rural environment and landscape of similar magnificence to that of the surviving rural area, in particular the Rural South. The borough's rural area is thus a remnant of a much larger area of undeveloped countryside that once existed. The landscape and environment of the rural area need to be recognised as heritage assets of at least equal importance to those of the urban area	borough's rural area has been characterised by the County Council in its 'Planning for Change' document, which has been adopted as an SPD. It is acknowledged that this document needs to be updated and a review is planned. However, the current characterisation work and the Joint Urban Design SPD make it clear that the quality of the rural environment is of mixed quality. There are some parts in the rural south in need of regeneration and enhancement. The Joint Urban Design SPD also draws attention to the way in which some of the villages display urban or suburban characteristics. The Strategic Urban Vision within the SPD sets the principles for a more legible and more distinct settlement pattern, which seeks to maintain, reinforce or create a positive rural character for the settlements and their landscape settings. The Joint Local Plan should give consideration to achieving this principle and how to retain and enhance high quality landscape areas. The Natural and Rural Environment Chapter and supporting technical paper draw attention to the large number of designated sites that are already protected due to their biodiversity and geological importance. Arguably some of these are already greater in importance to many of the areas listed buildings because of their 'international status.' Give consideration to the need for Historic Characterisation study around villages where the village envelope may be subject to change. See also response to comment 63
IC063/461	Judith Oppenheimer	p.66 'Heritage is often seen as a barrier to development'. Heritage is a barrier to development when it is not properly identified and understood.	This Key Challenge aims to flag up the viability of protecting and retaining the historic environment. It is important to understand historic context and this will continue to be explored through the plan production process.
IC071/536	Karen Watkins (Loggerheads)	Loggerheads Parish has some 80 grade II listed buildings. These are being documented as part of the Neighbourhood Plan.	Noted. The importance of the settings of listed buildings is recognised in national planning policy.

	Parish Council & Neighbourhood Plan Working Group)	Loggerheads strongly supports the concept that the setting of these assets is given priority in planning developments.	
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## Issue 2: Conserving Heritage Value

Reference	Consultee Name	Comments	Officer Comments
IC005/31	St Modwens	<p>As mentioned above, heritage value needs to be carefully considered to ensure that each heritage asset receives a suitable level of protection. This can be achieved through a comprehensive review of the current designated heritage assets as outlined above. Also as part of this a review of Conservation Areas should be undertaken, specifically the Burslem Conservation Area (CA). The Burslem CA originally included the former Royal Doulton Factory; however this building was unfortunately lost to fire, leaving no buildings within the CA. This has resulted in the CA now including an area of cleared land which has no conservation merit. It is recommended therefore that the CA is amended to remove this area to prevent any inappropriate constraint to future development of the site.</p>	<p>Appraisals of Conservation Areas are periodically undertaken by the councils. Such appraisals will inform the Joint Local Plan preparation process in order to support the preparation of appropriate planning policies that are relevant to conservation areas. Amendments to the boundaries of Conservation Areas are not dependent on the local plan process.</p>
IC009/94	Councillor Derek R Davies - NDP Steering Group	<p>SoT needs to be clear about the definition and identification of 'heritage assets' and about the current detrimental influence of its industrial legacy on the city's prospects.</p> <ul style="list-style-type: none"> <li>· The Heritage Commission Report is clear about the amount of duplication and redundancy of so-called 'heritage' buildings and the fact that many sites are not historic assets.</li> <li>· 'The extent of redundancy and the resultant air of dereliction poses great challenges both for the public image of the city as well in seeking to identify new users' (Technical paper 4.7).</li> <li>· It is clear from the report that SoT's so-called 'heritage' is a detriment to progress and development and that much of it is beyond use, repair or both.</li> </ul>	<p>'Heritage asset' is defined in national planning policy as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest" and that "Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)". This definition is recognised by both councils and it is also included in the Glossary in chapter 11 of the Issues Consultation Document. Heritage assets that fall within this definition are referred to in the background section and paragraph 7.16 in the Heritage chapter of the Issues Consultation Document. They are also identified in more detail in</p>



			<p>the Heritage Technical Paper.</p> <p>'Industrial legacy' is a matter that is distinct from the definition and identification of heritage assets, although the second key challenge under Issue 1 identifies that heritage assets can have a positive impact on the environment of an area.</p> <p>Policy approaches to address this key challenge will be explored at the Draft Plan stage and these will be informed by evidence including that provided by the Heritage Commission Report.</p>
IC009/95	Councillor Derek R Davies - NDP Steering Group	<p>The way in which SoT is clinging to its 19th- and 20th-century built environment indicates a misunderstanding that heritage is confined to the built environment and that anything that is old must be heritage. SoT's industrial legacy has left it with a low-quality built environment that needs to be swept away in order for the city to become an attractive and thriving place for business and living. Heritage also exists and is preserved in three-dimensional objects, photographs, documents, audio and video recordings. SoT must recognise that if it is to move forward a significant proportion of its built 'heritage' and industrial legacy can and must be preserved in the collections of the city's museum, library and archives.</p>	<p>'Heritage asset' is defined in national planning policy as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest" and that "Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)". This definition is recognised by both councils and it is also included in the Glossary in chapter 11 of the Issues Consultation Document. The local plan can not contain policies for recorded heritage such as the examples listed in the comment. Both councils recognise the value of heritage to tourism and the economy and will explore if there is the potential for policies to address such relationships at the Draft Local Plan stage.</p>
IC009/99	Councillor Derek R Davies - NDP Steering Group	<p>While NuL still has a street market, it has lost its identity as a market town since the closing of its livestock market. A succession of poor planning decisions from the late 1960s onwards have resulted in the as-yet unhalted decline of the town centre. The tackiness of the town centre, its shop fronts and poor-quality developments such as 1 London Road detract seriously from the aspect of a once-prosperous town centre. Appearances make it difficult to believe that the town centre is actually a conservation area. NuL could be attractive and prosperous again. NuL needs to look carefully at its architectural, cultural and historical heritage. Like</p>	<p>In part duplicates subjective comments made above, see response to IC063/457. These comments are not entirely borne out by the evidence. Although Zanzibar is not a heritage asset, it is currently undergoing substantial refurbishment funded by the private sector, which will vastly improve the external features of the building. Substantial funding has also been secured through Heritage Lottery for St Giles Church, Maxims former nightclub and the Philip Astley (founder of the modern circus ring) project</p>

		<p>SoT, it needs to distinguish between legacy and heritage. Eyesores such as the Zanzibar need to be demolished.</p> <p>A number one priority for NuL should be to put its heritage to work in the town centre. NuL needs to create heritage 'corridors' linking the town centre to heritage, cultural, conservation and residential areas that lie outside the ring road; to complement its heritage areas with attractive outdoor spaces; and to mitigate the blighting impact of the ring road on both the town centre and the areas immediately beyond it.</p> <p>As in the case of SoT, population could be attracted to town-centre living if the historic, cultural, leisure and shopping facilities were right.</p> <p>Like the Six Towns, NuL needs first-rate public transport links to the main cultural and economic centre in Hanley and to the railway station.</p>	<p>linking to the Victoria and Albert Museum.</p>
<p>IC009/105</p>	<p>Councillor Derek R Davies - NDP Steering Group</p>	<p>'...it is essential to only encourage those new uses [of traditional farmsteads] which are sensitive to the historic character and significance of the buildings'. The Plan needs to avoid making policies that stand in the way of sustainable business development in the rural area. Farmsteads offer large and adaptable spaces that can be put to a wide range of new business and industrial uses and still be compatible with the rural setting. What happens on the inside of the building is not material to its external appearance; also, well-designed modern additions to such buildings could make an important contribution.</p> <p>para.7.20 The redevelopment of redundant and cleared pottery industry sites, for both residential and business uses, should be a major objective of the Plan.</p> <p>para.7.21 If there is no use for redundant industrial and public buildings, their value needs to be questioned and reassessed.</p> <p>para.7.22 Everything does not have to be preserved. Not everything that is old is a heritage asset. Some structures have a negative legacy value.</p> <p>p.67 'Understanding the size and scale of heritage assets as they are often large in scale due to the industrial history of the area.' Don't give protections that stand in the way of progress. Do not confuse legacy and heritage.</p>	<p>See also response to IC063/462. In the rural area traditional farmsteads make an important contribution to landscape character and local distinctiveness. The Joint Local Plan will aim to create sustainable, high quality places for living and working. The redevelopment of a site in a rural area, or the particular use of a building or site in such an area is an important consideration as a part of bringing forward sustainable development and maintaining the open character of a rural area. The NPPF states in order to promote a strong rural economy planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. Issues and evidence concerning economic development in rural areas will inform further stages of Joint Local Plan preparation.</p> <p>Comments regarding the redevelopment of redundant and cleared sites for residential and business uses are noted and the potential for this to be an objective of the plan will be explored at the Strategic Options stage.</p>

			<p>The value of redundant industrial and public buildings is considered as part of the decision making process on relevant planning applications. The Joint Local Plan could contain a policy to encourage the reuse of such buildings and this can be explored at the Draft Local Plan stage (in regard to vacant historic assets, the reuse of these is covered under Issue 3).</p> <p>Both councils fully understand the distinction between heritage and legacy, and that not everything old is a heritage asset. National planning policy defines heritage assets as “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest”. It also states that “Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”. This is the definition of heritage asset that both councils will adhere to and it is also included in the Glossary in chapter 11 of the Issues Consultation Document.</p>
IC011/158	Thistleberry Residents Association	<p>It is important that both its rural and industrial heritage needs to be preserved in some way. Stoke-on-Trent is having a stab at that, Newcastle appears not to have begun to think in the box let alone outside it, as yet. 7.6 does not mention the timber-framed buildings that exist and which give the towns in both LAs character and flag up their long history. In Newcastle there are only 100 locally listed buildings/monuments. The local listing needs to be strengthened so that it does carry weight in planning terms and prevents developers knocking them down – often wantonly because they get in the way. The Museum in Newcastle is no longer the ‘Borough Museum’ and Wedgwood’s was not mentioned. As is rightly stated in 7.12-715 it is the buildings that contribute greatly to a sense of place and shape place significantly. 7.20 The duplication of civic and industrial buildings should not be seen as a negative aspect since these buildings have been well built they have architectural merit they stand out in a town and help to define identity so why</p>	<p>The process of registering locally important buildings and structures in Newcastle-under-Lyme has been adopted as an SPD. This helps buildings and structures on the list to be afforded added protection from adverse change or demolition. The SPD also sets out how the council will consider and treat local heritage assets on the register, which is regularly reviewed, and this helps to ensure it remains relevant and carries weight. Heritage assets are just one of many matters that the planning system needs to take into account in considering development proposals. In some instances, despite listing, the reasons for approving development can outweigh the needs to retain a particular building. Background section within the Heritage chapter is very comprehensive. The</p>

		demolish them? The small heritage buildings and sites seem to have been omitted for Newcastle - and yet they provide the building blocks to the town's history, supporting its bigger history and presenting a comprehensive history of a place. We also need to ask why these buildings and sites are not being used/utilised and what the LAs are doing to address their decline/non-use. This would apply to both urban and rural settlements.	councils' attitude to the historic environment should not be judged on the lack of specific historic references. Timber framed buildings are referenced in section 7.5. it explains that within Newcastle Town Centre these have been largely been replaced in the 18th and 19th centuries by the stone and brick buildings that now predominate and give Newcastle its recognisable character. The Heritage chapter contains no proposals to demolish any buildings, including civic buildings, but appropriately draws attention to the history of the city which has led to the unique situation of civic buildings being duplicated, creating extra challenges. The respondent has not made clear which heritage buildings and sites have been omitted and which ones are not being utilised, without supporting evidence it is difficult for the JLP to respond.
IC034/320	Historic England	Issue 2: Conserving Heritage Value – The first point of the 'Key Message' for this section refers to 'complex built heritage' only. It is recommended this be amended to refer to 'complex built and archaeological heritage' to address potential unknown heritage assets below ground. The fourth key challenge refers to the historic farmsteads but does not refer to their associated landscape setting which may be of significance as part of the historic environment. It is recommended that reference to the associated landscape setting be included in this point.	Comments noted. Future Joint Local Plan documents will also consider archaeological heritage and the landscape setting of historic farmsteads.
IC048/380	Newcastle-under-Lyme Civic Centre	The Society however does acknowledge the duplication of Civic Buildings as an outcome of the multiplicity of town centres that we have and applauds the wish to retain and re use them as in the instance of Burslem Town Hall. The Guildhall is another example of usage of a heritage asset as was the conservation of the warehouse in Ladd Lane, which was destined for demolition. It is such buildings which give towns and villages character and identity. identity is not something that can be pulled out of a hat, it is something that evolves and plays a large part in forming an idea and character of a place. And this needs to be managed. Where	Supporting comment noted. The Joint Local Plan gives the opportunity to review existing local design and conservation policy and this will be explored in further detail at the Draft Local Plan stage.

		that management is successful towns and villages have a chance to thrive. This is why far more thought needs to be given to new buildings and the context in which they are to be set and fit. This is where some developers and architects need guidance particularly where these concerns are not uppermost in their minds. Thus such guidance needs to be clearly articulated in Planning Policy to avoid planning slippage.	
IC048/381	Newcastle-under-Lyme Civic Centre	The JLP recognises the number of historic and listed buildings within the area as an asset. However, the Society expresses its concern as to the poor condition of many and the rate at which they are further deteriorating. Wish lists in documents, however well intentioned, amount to little without action on the ground to reverse the situation. Perhaps a full list of these buildings and assets needs to be looked at and presented to the public on a regular basis and certainly consulted re alternative use, and even Community Right to Buy in order to bring them up to standard and into usage if that is not already the case.	Comment noted. The potential for more detailed policies to address the identified issues will be explored at the Strategic Options and Draft Plan stages. Both councils maintain a local list and Historic Environment Record which provide information about the status of historic buildings. Alongside Historic England's Heritage at Risk Register, these records will provide evidence to inform any such future policies in the Joint Local Plan. Community Right to Buy (Community Right to Bid) was introduced by the Localism Act 2011 and is a separate process to development plan preparation.
IC063/462	Judith Oppenheimer	para.7.19 '...it is essential to only encourage those new uses [of traditional farmsteads] which are sensitive to the historic character and significance of the buildings'. The Plan needs to avoid making policies that stand in the way of sustainable business development in the rural area. Farmsteads offer large and adaptable spaces that can be put to a wide range of new business and industrial uses and still be compatible with the rural setting. What happens on the inside of the building is not material to its external appearance; also, well-designed modern additions to such buildings could make an important contribution.	See also response to IC009/105 Business development cannot be sustainable if it undermines the historic character of traditional farmsteads. Changes of use that do not affect the external appearance of a farmstead may not always be compatible with the rural setting if as a result of the new use significant additional traffic is generated or trade is directed from a more sustainable location. A well-designed extension can make a positive contribution to the original building and its setting. However, the JLP should consider how rural diversification can be achieved in a sustainable manner.
IC063/463	Judith Oppenheimer	para.7.20 The redevelopment of redundant and cleared pottery industry sites, for both residential and business uses, should be a major objective of the Plan. para.7.21 If there is no use for redundant industrial and public buildings, their value needs to be questioned and reassessed.	Comments regarding the redevelopment of redundant and cleared sites for residential and business uses are noted and the potential for this to be an objective of the plan will be explored at the Strategic Options stage.

		<p>para.7.22 Everything does not have to be preserved. Not everything that is old is a heritage asset. Some structures have a negative legacy value.</p> <p>p.67 'Understanding the size and scale of heritage assets as they are often large in scale due to the industrial history of the area.' Don't give protections that stand in the way of progress. Do not confuse legacy and heritage.</p>	<p>The value of redundant industrial and public buildings is considered as part of the decision making process on relevant planning applications. The Joint Local Plan could contain a policy to encourage the reuse of such buildings and this can be explored at the Draft Local Plan stage (in regard to vacant historic assets, the reuse of these is covered under Issue 3).</p> <p>Both councils fully understand the distinction between heritage and legacy, and that not everything old is a heritage asset. National planning policy defines heritage assets as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest". It also states that "Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)". This is the definition of heritage asset that both councils will adhere to.</p>
IC069/509	Neil Dawson	Encourage joint action for supporting the Heritage buildings and encourage tourism	Supporting comment for the third key challenge noted. Potential policies to address this challenge will be explored at the Draft Local Plan stage.
IC071/537	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	<p>Of these challenges, the most relevant to Loggerheads is the last. We are concerned that permitted development rights for agricultural properties might be a threat to such assets.</p> <p>The Shropshire Union Canal is the most relevant industrial asset which is protected by conservation area status and is a major tourist attraction as well as a valuable wildlife corridor.</p> <p>We feel that the idea of using the legacy industrial built environment as a means of attracting tourists is unrealistic. Heritage assets include the landscape and rural environment. This is not mentioned in the consultation. A local example is the battlefield at Blore Heath.</p>	<p>Noted. The Government's changes to permitted development rights are a matter over which the Joint Local Plan has no influence. Changes to the rural landscape in which most of the agricultural properties sit would be influenced by the Staffordshire-wide Supplementary Planning Guidance (SPG) that forms the Landscape Character Assessment (LCA) for the Joint Local Plan Area. This SPG can inform a more detailed LCA for the Plan Area. A review of the SPG has been discussed with Staffordshire County Council and is planned. The intrinsic character of the rural landscape is an attraction in its own right, although for its landscape rather than heritage value.</p>

			Consider how the Historic Farmstead Guidance could be incorporated into planning policy within the Joint Local Plan. The Glossary lists Registered Battlefields as a Heritage Asset and also makes it clear that landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest can also be a heritage asset. It is therefore implicit in the definition of a heritage asset that the issues can relate to the landscape and rural environment. However, this should perhaps be made more explicit in future Joint Local Plan consultation documents.
IC077/596	Andy Perkin (Potteries Heritage Society)	The key challenge "To try to increase the attraction of the area as a tourist destination based on its industrial heritage" (under 7.22) is the only mention of tourism in this section and appears without reference to research or any key messages. And why "try to..." rather than just "to increase..." as in all the other challenge statements? Heritage tourism should be fundamental to our strategy and the resulting Local Plan, regardless of whether this results in recognised visitor attractions or an enhancement of local character.	The relationship between heritage and tourism has been identified from Strategic Aim 8 and Policy SP2 of the Core Spatial Strategy, the Stoke-on-Trent Heritage Commission Report (2014), the Heritage Counts West Midlands report (2014). These documents are explored in detail in the Heritage Technical Paper. Both councils recognise that the key challenge could be taken forward in the plan preparation process in a more definitive way.
IC077/597	Andy Perkin (Potteries Heritage Society)	While the Society recognises there is a duplication of municipal and amenity buildings across the centres, the Local Plan needs to help secure new uses for these, preferably as community or business facilities where local people would continue to be welcome.	Noted. Potential policies for the reuse of such buildings for community or business use will be explored at the Draft Local Plan stage.
IC078/599	Steve Wood	Canal led regeneration must be a priority with the Burslem Port project being a key opportunity for this. This would improve the local environment, boost property values and create employment. The Middleport area has been in a state of change for many years and a coherent strategy is needed to make sure that the greatest possible advantage is taken of the adjacent Etruria Valley regeneration. The boost given by Middleport Pottery should be expanded to improve and extend the tourism offering in Burslem and Middleport, encouraging more people to discover these historic areas.	The City Council has prepared a Canal Opportunities Study which examines how positive relationships between canals and surrounding areas can be maximised. This will be considered alongside other relevant evidence at the Draft Local Plan stage to explore the potential for specific site and area proposals such as those referred to in the comment, as well as the potential for detailed policies related to heritage and design.
IC079/607	Andy Perkin (on behalf of) Stoke	The key challenge "To try to increase the attraction of the area as a tourist destination based on its industrial heritage" (under 7.22) is	The relationship between heritage and tourism has been identified from Strategic Aim 8 and Policy

	Neighbourhood Forum	the only mention of tourism in this section and appears without reference to research or any key messages. Heritage tourism should be fundamental to our strategy and the resulting Local Plan, regardless of whether this results in recognised visitor attractions or an enhancement of local character.	SP2 of the Core Spatial Strategy, the Stoke-on-Trent Heritage Commission Report (2014), the Heritage Counts West Midlands report (2014). These documents are explored in detail in the Heritage Technical Paper. Both councils recognise that the key challenge could be taken forward in the plan preparation process in a more definitive way.
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### Issue 3 – Integrating new developments into the existing historic setting

Reference	Consultee Name	Comments	Officer Comments
IC005/32	St Modwens	Again, as mentioned above, whilst the importance of protecting heritage assets is recognised, where they are falling into disrepair and enabling development still proves unviable, the Councils must be willing to accept other means of retaining their heritage; even if the structures themselves need to be lost. As previously mentioned, by having an overarching aim of encouraging high quality economic development, the weight attached to retaining heritage assets can be properly assessed.	Ensuring that the reuse of heritage assets is economically viable is a matter that is explored under Issue 2. Even where proposed uses may be unviable, national policy states that “great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification”. The Joint Local Plan will be required to adhere to these requirements of national policy and so the loss of heritage assets would require strong justification.
IC009/97	Councillor Derek R Davies - NDP Steering Group	Families with children want to live in urban and central locations so as to be close to facilities that families need the most – shopping, education and leisure and cultural facilities. European studies have found that higher-income professional families are attracted to live in historic urban areas, including the most central locations, on the basis of the historic offer and high-quality leisure and shopping and cultural facilities. The same studies have found that people in the creative industries are also attracted to town-centre living in historic urban areas on the basis of the historic, cultural, social and business networking offers. SoT has a strong creative make-up based on the output of the local art schools and Staffordshire	Support for encouraging families with children, higher-income professional families and young creative professionals to live in historic urban centres is noted. Any policy option to direct such households to these locations will require justification based on housing needs. The Strategic Housing Market Assessment is the primary evidential source for this. Other evidence such as the European studies referred to in the comment need to be specified for the councils to consider them in the plan preparation process.



		University's film school and needs to look seriously at making itself attractive to young creative professionals.	
IC009/98	Councillor Derek R Davies - NDP Steering Group	SoT needs to decide whether it wants to be the city of Stoke-on-Trent or the Six Towns. If the Six Towns, <ul style="list-style-type: none"> <li>- a distinctive local identity, cultural offer and economy needs to be developed in each town</li> <li>- quality historic buildings need to be selected that genuinely contribute to the local environment of each centre and need to be re-invented as prestige business, residential and leisure locations</li> <li>- each town must have first-rate public transport links to the main cultural and economic centre in Hanley</li> <li>- each town must have first-rate public transport links to the railway station so as to enable access to the main regional cultural, leisure and shopping centres in Birmingham, Manchester and Liverpool.</li> </ul>	This comment refers to the development strategy for the city to be applied in the Joint Local Plan. This will begin to be explored at the Strategic Options stage.
IC009/106	Councillor Derek R Davies - NDP Steering Group	para.7.24 Don't try to protect buildings that have a short life and no longer have value. In terms of the bottle oven, the Gladstone Museum performs a key role, as do City Museum, library and archive collections. Also, there is a recognised place in the heritage industry for reconstructions. p.68 'Safeguarding buildings that do not have statutory protection.' Consider whether they have any value that makes them worth safeguarding at all, and whether NPPF para. 139 has been misunderstood and misapplied.	See also response to IC063/464. Both Councils have a Register of Locally Important Buildings and Structures. This aims to afford some protection to local heritage assets, which do not have statutory protection. The lists are subject to regular review to see if buildings or structures should remain on the list or whether new ones should be added. Many nominations following careful consideration do not get included. Local conservation areas are similarly regularly reviewed. Paragraph 139 of the NPPF relates to "non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments" and not buildings as referred to in the key challenge. The reference to NPPF paragraph 139 is therefore not relevant in this instance.
IC009/109	Councillor Derek R Davies - NDP Steering Group	Strategic Aim 16 (SA16) of the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2009 to 2026 sets out "to eliminate poor quality development and establish a culture of excellence in built design by developing design skills and understanding, by requiring good, safe design as a universal baseline and distinctive design excellence in all development proposals, and by promoting procurement methods which facilitate the delivery of good design". This is also recognised as a weakness in the supporting Heritage	The Issues Paper was not intended to be fully comprehensive and more attention needs to be given to building design and urban design. However, the City, Towns and Other Centres Chapter do address this indirectly. The design quality of the built environment will be given detailed attention at the Draft Plan Stage but the design of the urban form or settlement pattern

		<p>technical paper but there is no mention of this in the Issues consultation paper.</p> <ul style="list-style-type: none"> <li>- Piecemeal development is also registered as a weakness in the supporting Heritage technical paper but no mention of this in the Issues consultation paper.</li> </ul>	<p>should be considered in more detail at Spatial Options. Securing high quality design is one of national planning policy's core planning principles in the NPPF. Locally, joint planning policy includes the Newcastle and Stoke Urban Design Guidance Supplementary Planning Document (2010) which recognises that good design is considered essential for sustainable development and it is recognised as a key contributor to economic value, community health, social well-being and inclusion, as well as to the quality of the environment.</p>
IC034/321	Historic England	<p>Issue 3: Integrating new development into the existing historic setting – It is noted that the text for Paragraphs 7.23 and 7.24 is taken from the information included in the Heritage Technical Paper, in particular from the report findings of the Heritage Commission Report. It is considered that the commentary for this issue in its current form is fairly weak and could have been explored and expanded in more detail particularly when new development in the Joint Local Plan area is likely to impact on the historic environment substantially. It is recommended that this issue is explored in more detail and links with other issues within the document are highlighted to allow for synergistic approaches as the plan progresses.</p> <p>References to 'historic heritage' should be amended to read 'historic environment, heritage assets and their settings' (key challenge section).</p>	<p>Noted. In future iterations of the Joint Local Plan try to avoid using generic terms such as 'historic heritage' to avoid this being narrowly defined. In regard to the extent of the commentary surrounding the issue, the consultation document is intended to provide a short summary whilst the technical papers provide the more detailed exploration of evidence which can also be referred to by the reader. The councils acknowledge that the issue ought to be explored in more detail and link in with other issues identified. This will be addressed at the Draft Plan stage in particular.</p>
IC063/464	Judith Oppenheimer	<p>para.7.24 Don't try to protect buildings that have a short life and no longer have value. In terms of the bottle oven, the Gladstone Museum performs a key role, as do City Museum, library and archive collections. Also, there is a recognised place in the heritage industry for reconstructions.</p> <p>p.68 'Safeguarding buildings that do not have statutory protection.' Consider whether they have any value that makes them worth safeguarding at all, and whether NPPF para. 139 has been misunderstood and misapplied.</p>	<p>See also response to IC009/106. Both Councils have a Register of Locally Important Buildings and Structures. This aims to afford some protection to local heritage assets, which do not have statutory protection. The lists are subject to regular review to see if buildings or structures should remain on the list or whether new ones should be added. Many nominations following careful consideration do not get included. Local conservation areas are similarly regularly reviewed</p> <p>Paragraph 139 of the NPPF relates to "non-designated heritage assets of archaeological</p>

			interest that are demonstrably of equivalent significance to scheduled monuments” and not buildings as referred to in the key challenge. The reference to NPPF paragraph 139 is therefore not relevant in this instance.
IC071/538	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	Loggerheads has a relatively large number of listed buildings and the above objectives are all supported by us and will be pursued as part of the development planning process.	Noted and welcome general support. Issues and evidence concerning the historic environment will inform further stages of preparation of the Joint Local Plan, and it's SA/SEA.
IC078/598	Steve Wood	The canals of the city provide a high quality open space that encourages healthy lifestyles. Improved signage and access would help promote this.	The provision of signage is outside the scope of a Local Plan, nevertheless the City Council has worked with the Canal and River Trust to significantly improve the accessibility of the local canal network over recent years. The borough council have commissioned a Green Infrastructure Strategy. This will consider the potential of water resources to contribute to the availability of publicly accessible open space. Issues and evidence regarding the water environment will inform later stages of Joint Local Plan preparation.
IC081/616	Celia Richie	Issue 3 of the plan states " Integrating new developments into existing historic setting. To protect and enhance the historic heritage and the unique character of the area by ensuring new developments are appropriate in terms of scale, location and their context etc" Will this plan actually be adhered to when it is agreed or will the current disregard to our heritage continue?	National planning policy states that “planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise”. The Joint Local Plan will become the primary development plan document for both local authority areas which planning decisions must accord with. There is always potential for other material planning considerations to indicate that some decisions can be made that do not accord with the development plan. The role of the Joint Local Plan is to review the local planning policies which aim to protect and enhance the areas local heritage. Any new policies will be consulted on at the Draft Plan stage.

## Issue 4: Rural Village Settings

Reference	Consultee Name	Comments	Officer Comments
IC008/44	Natural England	<p>Newcastle-under-Lyme is characterised by a number of dispersed rural villages which form an important part of the historic landscape of the area</p> <p>Key challenge:</p> <ul style="list-style-type: none"> <li>• Recognising and preserving the rural settlement pattern.</li> <li>• Integrating new development which meets the needs of rural areas.</li> <li>• Ensuring that the setting of historic assets is taken into account.</li> <li>• Recognising landscape setting and character.</li> </ul>	Noted. This is a repetition of the key message and challenges under Issue 4 Rural Village Settings.
IC009/101	Councillor Derek R Davies - NDP Steering Group	<p>Prior to their growth and development the urban areas of NuL and SoT comprised a rich rural environment and landscape of similar magnificence to that of the surviving rural area, in particular the Rural South. The borough's rural area is thus a remnant of a much larger area of undeveloped countryside that once existed.</p> <p>The landscape and environment of the rural area need to be recognised as heritage assets of at least equal importance to those of the urban area.</p> <p>Staffordshire's County Development Plan of 1958 identified 'Six areas of special landscape value', of which one included a large area in what is now NuL's Rural South: '(c) Maer and Hanchurch Hills (area about 22 sq. miles). The area extends from the Maer Hills at the north-west to Trentham Park at the north-east and includes Whitmore and Swynnerton Old Park. Towards the south-west the boundary extends to near Ashley and at the south it includes the villages of Maer and Swynnerton. Tittensor and Bury Bank are included at the south-east.'</p> <p>The rural area also has its own history, of both local and wider, regional and national importance, one example being the battlefield of Blore Heath and the village of Mucklestone</p>	Chapter 8.0 Natural and Rural Environment set out some of the key issues affecting the rural environment. The 1958 Development Plan is out of date and has no planning status. The current SPD 'Planning for Landscape Change' provides a framework for policy guidance, although it is recognised this too needs to be updated, see section 8.20. A review of that SPD has been discussed with Staffordshire County Council. Many parts of the rural area are already recognised as heritage assets including Keele Hall, the Maer Estate, both registered as historic park and gardens. The battlefield of Blore Heath is a scheduled ancient monument and is a recognised heritage asset. There are also at least 10 conservation areas in the borough's rural area. It is at the Draft Joint Local Plan stage that policies will be developed to help preserve and enhance the character and appearance of the historic heritage of the borough.
IC027/270	Keele Parish Council	We are pleased to see the plan recognises the importance of "preserving the pattern of dispersed rural villages to the west and south of the urban areas". It is our view that the Green Belt policy	Noted. At this stage there are no proposals to amend the Green Belt Boundary, until further evidence from the SHLAA suggests this is

		needs to consider retaining the separation of these villages as well as preventing urban sprawl	necessary.
IC071/539	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	These objectives are all strongly supported by Loggerheads.	Noted, although challenges have been identified rather than future objectives. Draft objectives will be consulted on at the Spatial Options Stage.



## Schedule of Comments Natural and Rural Environment

General Comments			
Reference	Consultee Name	Comments	Officer Comments
IC008/51	Natural England	<p>The report does not appear to refer to soils or ‘best and most versatile land’. Our email of 11.9.15 in relation to the local plan’s Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) provided information on how to source relevant information. If the Council has any questions on this theme please get in touch. We offer the following advice in the meantime:</p> <p>The Local Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.</p> <p>To assist in understanding agricultural land quality within the plan area and to safeguard ‘best and most versatile’ agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the <a href="http://www.magic.gov.uk">www.magic.gov.uk</a> website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform plan making. New ALC surveys may be required for sites allocated in the plan.</p>	<p>Noted. The Agricultural Land Classification and soil resources will be taken into account through work in relation to the SHLAA and SA/SEA. Where significant development of agricultural land is demonstrated to be necessary we will seek to use areas of poorer quality land in preference to that of a higher quality. Section 112 NPPF. Issues and evidence concerning geodiversity (including management of soils) will inform further stages of preparation of the Joint Local Plan.</p>
IC008/40	Natural England	<p>In accordance with the NPPF, the plan’s development strategy should seek to avoid areas of high environmental value. We welcome clear reference to this national policy requirement at para 8.8 of the report. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are</p>	<p>Noted. In accordance with paragraph 17 of the National Planning Policy Framework (NPPF) the Joint Local Plan should, where ever possible, prefer allocations of land for development on land of lesser environmental value taking into account wider planning policies and the SA and HRA</p>

		selected, e.g. land allocations should avoid designated sites and landscapes.	process.
IC009/118	Councillor Derek R Davies - NDP Steering Group	<p>The rural area of NuL comprises 80% of the total area of NuL. It also comprises 55.6% of the total Joint Local Plan area. Agriculture and the rural economy therefore make a significant contribution to the borough's economy.</p> <p>The Joint Local Plan Issues consultation fails to recognise that agricultural land is a highly important economic asset for NuL and the Joint Local Plan area as a whole. The rural area also has significant areas of ancient woodland, commercial forestry and other woodland.</p> <p>Paras 6.11 and 6.12 of the technical paper state:  'The vast majority of the rural area to the west of Newcastle-under-Lyme lies within Grade 3 land ... Isolated areas of Grade 2 land are also present within the borough, particularly to the south-west of the borough in the area to the west of Loggerheads.  'Therefore there is some potential for further land falling under the definition of "best and most versatile" agricultural land to be present in Newcastle-under-Lyme's rural area ... the limited amount which can be identified does not adjoin any major settlement within the rural area, so such land may be less likely to come under pressure from speculative development.'</p> <p>The Agricultural Land Classification for England shows Grade 2 agricultural land immediately to the north of and adjoining Baldwins Gate village. A 5.6ha area of Grade 1 and Grade 2 agricultural land in this location was lost to housing development in 2015. In order to prevent further losses of valuable agricultural land it is essential for NuL to have plan-led development. With a rapidly rising population (both nationally and globally) the importance of ensuring that agricultural land is not lost to development of any sort cannot be sufficiently stressed. Future generations will not thank us for destroying the land that feeds them.</p>	<p>The importance of the rural economy is considered in the Joint Employment Land Review. The evidence states that there is limited rural business space of any size or volume located in the rural area and significantly no hidden unmet demand for space (section 6.85). Agriculture contributes most to the rural economy. However, with the exception of gas and oil agriculture provides the least number of jobs across the plan area and furthermore future forecasts do not identify agriculture as a key driver for future job growth and instead predict job losses (section 8.28). It would therefore be wrong to overstate the role of agriculture in the borough's economy as a whole. Nevertheless, responsible agriculture is very important to protecting the countryside, delivering improvements to the environment, supplying food and supporting a unique way of life and shaping the borough's identity. In accordance with section 112 of the NPPF local authorities are only required to take into account the economic benefits of the best and most versatile agricultural land, and where significant development of agricultural land is demonstrated to be necessary LPAs should seek to use areas of poorer quality land in preference to that of a higher quality. The objective of the Joint Local Plan is to promote sustainable development through an up to date development plan.</p>
IC009/122	Councillor Derek R Davies - NDP Steering Group	<p>Lack of suitable public transport means that the majority people who visit the rural area for leisure and tourism do so by car. Absence of suitable car parking places forces people to pull in at gateways, on grass verges etc., this being one example of wear and tear on the environment. Suitable small car parks, parking bays and laybys need to be created at points of access to walking</p>	<p>The provision of picnic tables and seats for walkers is not a planning matter that can be addressed by the Joint Local Plan. The provision of parking facilities is a matter for the highway authority. Comments will be forwarded to Staffordshire County Council.</p>

		<p>routes. Seats and picnic tables need to be provided at suitable locations on walking routes.</p> <p>Maps of walking routes in the rural area, with the locations of parking facilities, seats and picnic tables, need to be made available. (In the 1980s NuL published a series of booklets by George Riley on walks in the rural area. These are no longer available, not even in the County Library system.)</p>	
IC011/160	Thistleberry Residents Association	From this Plan it would appear that Stoke-on-Trent is going to concentrate on being a centre of industrial heritage and purpose and Newcastle a centre for its rural hinterland – which suggests that Newcastle might be destined to become a suburb of Stoke-on-Trent	The Issues Consultation document does not propose any spatial options, but it does draw attention to important issues including the need to enhance the economic prosperity of both local authority areas, while continuing to respect the distinctive identities of our unique communities see section 1.3.
IC012/177	Keele University	The issues and challenges identified are comprehensive and not disputed.	Noted, this general support validates our approach.
IC051/397	Environment Agency	There is no reference to the Water Framework Directive within this document. The EU Directive cuts across a number of topics within the Natural Environment and should underpin much of the improvements sought in relation to watercourses and water in general. There is a requirement for all waterbodies to reach “Good” status by 2027 and there should be no deterioration in quality within that period. The Water Framework Directive is implemented by evidence from the River Basin Management Plan, in this case the Humber, and is then split into catchments with its own specific actions.	Noted. The Joint Local Plan will consider the implications for the water environment emerging from the Water Framework Directive and Humber River Basin Management Plans. This can be reflected in forthcoming stages of Plan preparation.
IC051/398	Environment Agency	<p>Rivers, lakes, wetlands and water underground provide many difference benefits to society; from supplying drinking water and supporting fisheries to providing an essential resource for business and agriculture, transport routed and source of recreation that promotes wellbeing.</p> <p>It is critical that this precious resource is managed properly to ensure that the needs of society, economy and wildlife can be met and maintained over the long-term. The purpose of a river basin management plan is to provide a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resourced are closely</p>	Noted. Issues and evidence concerning the water environment and sustainable water management will inform further stages of preparation of the Joint Local Plan, and its SA/SEA.



		linked, it also informs decisions on land use planning.	
IC051/407	Environment Agency	We are pleased to note that reference has been made to Green Infrastructure. The value of green and blue infrastructure, both designated and non-designated areas (8.28), should be fully assessed through holistic ecosystem service evaluations to fully understand the potential benefits to be provided, e.g. attenuating flood risk, health and well-being. Green Networks or Corridors along watercourses in particular, are vitally important in establishing links between habitat and allowing the free movement of species and also allowing adaptation to climate change through this process. One of the most effective measures to encourage this is by ensuring that easements from watercourses are maintained through new development, and where redevelopment is taking place including demolition of buildings formerly very close to the watercourse that new opportunities for corridors are opened up. Commonly, 6, 8 or 10 metres are used depending on the location and size of watercourse. This also has the dual benefits of allowing maintenance to take place and reducing the risk and impact of flooding.	Noted. The Councils are updating their evidence bases for the Joint Local Plan. Issues and evidence concerning the water environment and sustainable water management will inform further stages of preparation of the Joint Local Plan, and its' SA/SEA. The draft Newcastle-under-Lyme Green Infrastructure Strategy makes references to ecosystems services, recognising the wide benefits of ecosystem services will inform further stages of Joint Local Plan preparation in accordance with paragraph 109 of the NPPF. An ecosystems assessment for Staffordshire and Stoke has been prepared by the Local Nature Partnership and this emphasises the significance of habitats for the range of ecosystem services (ES) they provide.
IC066/492	Elena Sudlow (Maer & Acton Parish Council)	We are a rural parish and agriculture plays a large part in our community. We believe that this issue should be included in the joint local plan, including woodland. Maer & Aston Parish Council have noted that this is a joint local plan with Stoke on Trent and have concerns that as there is little agricultural land in Stoke-on-Trent they will be less considerate to the needs of the rural areas of Newcastle-under-Lyme.	Noted. Section 8.8 of the Issues Consultation document explains that preservation and enhancement of the natural environment, including ancient woodland and veteran trees, is a key requirement of national planning policy. Issues and evidence concerning biodiversity (including woodland) will inform further stages of JLP preparation. The NPPF makes references to agricultural land, paragraph 17 advises the Joint Local Plan (JLP) should, where ever possible, prefer allocations of land for development on land of lesser environmental value taking into account wider planning policies; and paragraph 112 states local authorities are only required to take into account the economic benefits of the best and most versatile agricultural land, and where significant development of agricultural land is demonstrated to be necessary LPAs should seek to use areas of poorer quality land in preference to that of a higher

			<p>quality. There is no requirement for the JLP to repeat national policy, but where there are specific local issues they should feed through into it as appropriate. As the Local Plan is being prepared jointly with Stoke-on-Trent City Council this is a shared duty and it is immaterial which part of the plan area the agricultural land is in. We welcome the Parish Council engaging with further stages of draft JLP preparation.</p> <p>See also response to IC009/118 above.</p>
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**Issue 1 Increasing development needs and their impact upon locally designated sites**

Reference	Consultee Name	Comments	Officer Comments
IC008/48	Natural England	<p>We welcome reference to the Councils' duty to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (para 8.9). The Local Plan should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environment value is chosen for development, and to ensure the mitigation hierarchy is followed.</p> <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. The Staffordshire Biodiversity Action Plan (LBAP) identifies the local action needed to deliver UK targets for habitats and species and also identifies targets for other habitats and species of local importance. It may provide a useful blueprint for biodiversity enhancement in the joint local plan area.</p> <p>Protected species are those species protected under domestic or European law. Further information can be found here Standing</p>	<p>Noted and welcome general support that validates our approach on the issue of biodiversity and GI. The JLP will be supported by a Sustainability Appraisal/Strategic Environmental Assessment which will consider the likely significant effects on the environment. Both councils are also updating their evidence bases relating to open space, green space and green infrastructure to inform future production stages of the Joint Local Plan. The draft Newcastle-under-Lyme Green Infrastructure Strategy will provide valuable evidence to guide policies which support ecological networks. An ecosystems assessment for Staffordshire and Stoke has been prepared by the Local Nature Partnership and this emphasises the significance of habitats for the range of ecosystem services (ES) they provide.</p>

		<p>advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p> <p>We welcome the report's clear reference to ecological networks and related issues.</p> <p>8. Natural and rural environment</p> <p>Key messages:</p> <ul style="list-style-type: none"> <li>• There are large areas of local ecological and geological importance in Newcastle-under-Lyme and Stoke-on-Trent</li> <li>• Future development needs may limit opportunities to improve and expand networks of locally important sites and place development pressures on existing sites</li> </ul> <p>Key challenges:</p> <ul style="list-style-type: none"> <li>• Balancing the need to plan for new development with the protection and improvement of local natural assets.</li> <li>• Plan positively to create, protect, enhance and manage a multifunctional network of green infrastructure.</li> </ul> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain and increase connectivity - to enable free movement and dispersal of wildlife. A further key principle is to ensure resilience to climate change. You may find Natural England's National Biodiversity Climate Change Vulnerability Assessment data of use in determining the vulnerability of your ecological networks to climate change. The data can be found <a href="#">here</a> and the report can be found <a href="#">here</a>.</p> <p>Priority habitats can be found on the <a href="#">magic website</a>. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these. The plan should promote the preservation, restoration and recreation of priority habitats. When considering the re-use of brownfield land, it will be important to make clear that such sites can be of high environmental value, such as open mosaic habitats on previously developed land.</p> <p>We note the report's reference to irreplaceable habitats, such as ancient woodland and veteran trees. Appropriate policies to ensure their protection should be formulated. Natural England and the Forestry Commission have produced standing advice on ancient woodland and veteran trees.</p>	
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IC009/113	Councillor Derek R Davies - NDP Steering Group	<p>It is essential for NuL to develop Local Plan policies that (1) specifically protect the rural area from inappropriate development and (2) focus on the natural environment, biodiversity and supporting a healthy rural economy. Housing and employment development in the rural area should focus on sustaining the rural population and economy, not on expansion.</p> <p>It is also essential for NuL to have a Local Plan that enables it consistently to demonstrate a five-year supply of housing land. NuL should not plan for more housing development than its recent planning history demonstrates that it can realistically deliver. Without this, development will continue to be developer led, not plan led; the Joint Local Plan will be unenforceable; and NuL will find it difficult to protect its rural area.</p>	<p>Noted. To be found sound the Joint Local Plan must be positively prepared and this means it must seek to meet the housing needs of the borough as a whole while also promoting sustainable development. It must also demonstrate a deliverable five year housing land supply. Issue 1 relates to development pressure affecting designated sites, rather than biodiversity, the natural and the rural area more generally as referred to in this comment. Specific comments relating to a five year housing land supply are more relevant to the Housing Issues chapter.</p>
IC009/115	Councillor Derek R Davies - NDP Steering Group	<p>NuL is nationally significant in hydrological and environmental terms because (1) it is located within three of England's major water catchment areas: the Severn, Humber and Mersey; and (2) it lies within the West Midlands Meres and Mosses area. The Meres and Mosses are locally, nationally and internationally important sites. NuL has more Meres and Mosses sites than any other district or borough in Staffordshire.</p> <p>Staffordshire Wildlife Trust (SWT) has identified 'maintenance, restoration and expansion of wetland complexes, with particular emphasis on the mosses resources' as a primary objective for this habitat type (SWT Biodiversity Opportunities Mapping, 3.1.4). A further objective is to 'promote appropriate management of the immediate catchment areas of wetlands to increase site sustainability, resilience to environmental change and improve biological water quality' (ibid).</p> <p>Mosses areas in the Rural South are Chorlton Moss in the Humber catchment and Maer Moss, the Bogs, the Wellings and Willoughbridge Bogs in the Severn catchment. Water abstraction from the principal aquifers that underlie these sites, to serve the growing population of the N. Staffordshire conurbation, is lowering the water table in this area. Urbanisation in local settlements, climate change and changes in agricultural land use pose further threats to these sites.</p>	<p>Noted. The Councils are updating their evidence bases for the Joint Local Plan. Issues and evidence concerning biodiversity, the water environment and sustainable water management will inform further stages of preparation of the Joint Local Plan. The Joint Local Plan will be supported by a Sustainability Appraisal/ Strategic Environmental Assessment which will consider all the likely significant effects on the environment.</p>
IC049/384	Woodland Trust	<p>Whilst we are pleased to see the reference to ancient woodland in the Issues document, it is critically important that the Local Plan</p>	<p>Noted. Issues and evidence concerning biodiversity, geodiversity, ancient woodland and</p>

		fully protects ancient woodland and ancient trees too.	veteran trees will inform further stages of Joint Local Plan preparation.
IC049/385	Woodland Trust	<p>Preferably we would like to see a separate Trees and Woodland Policy in the Local Plan.</p> <p>If not, we would like to see inclusion of the following text:  “DEVELOPMENT THAT DAMAGES OR DESTROYS ANCIENT WOODLAND AND ANCIENT TREES WILL NOT BE PERMITTED.  We would also like to see a commitment in the Local Plan to back this up in a future ‘Trees &amp; Woodland Strategy’.</p>	Noted. Criteria based policies, which encourage opportunities to incorporate biodiversity in and around developments will be considered at the Draft Plan Stage. However, a local policy that prevents damage to or the loss of ancient woodland and veteran trees is unnecessary; as these habitats are already protected by National Planning Policy see section 118 of the NPPF.
IC049/386	Woodland Trust	As well as preservation and enhancement of the natural environment, it is also important that development should support EXPANSION of semi-natural habitats like trees and woodland for all the benefits they can deliver to green infrastructure and place-making.	Noted. The Councils are updating their evidence bases for the Joint Local Plan. Biodiversity issues and evidence will inform further stages of Joint Local Plan preparation. The draft Newcastle-under-Lyme Green Infrastructure Strategy makes references to ecosystems services and the objective to increase the robustness of ecosystems through long-term management planning, starting with those areas most at risk of further decline. Recognising the wide benefits of ecosystem services will inform further stages of Joint Local Plan preparation in accordance with paragraph 109 of the NPPF.
IC049/387	Woodland Trust	<p>Preferably we would like to see a separate Trees and Woodland Policy in the Local Plan</p> <p>If not, we would like to see the following text:  “development should seek opportunities to create, enhance, restore and connect habitats, such as trees and woodland.  We would also like to see this backed up in the future “ Trees &amp; Woodland strategy</p>	Noted. A local policy that prevents damage to or the loss of ancient woodland and veteran trees is unnecessary; as these habitats are already protected by national policy, see section 118 of the NPPF. However, criteria based policies, which encourage opportunities to incorporate biodiversity in and around developments will be considered at the Draft Plan Stage.
IC064/481	Woodland Trust	Whilst we are pleased to see the reference to ancient woodland in the Issues document, it is critically important that the Local Plan fully protects ancient woodland and ancient trees too.	Noted. Criteria based policies, which encourage opportunities to incorporate biodiversity in and around developments will be considered at the Draft Plan Stage. However, a local policy that

		<p>It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with emerging national policy as set out below.</p> <p>With Newcastle-under-Lyme and Stoke-on-Trent Councils showing an ancient woodland resource of 3.08% and 0.08% respectively of land area compared to a UK average of 2.5%, it is critical that this valuable natural resource is absolutely protected in this Local Plan and highlighted appropriately</p> <p>It is also important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees.</p>	<p>prevents damage to or the loss of ancient woodland and veteran trees is unnecessary; as these habitats are already protected by National Planning Policy see section 118 of the NPPF. Biodiversity issues and evidence will inform further stages of JLP preparation.</p>
IC069/511	Neil Dawson	Please clarify whether Ford Green Nature Reserves reed beds are SSSI not Ford Green.	There is no reference within the Issues Consultation Document or the Natural and Rural Environment Technical Paper to Ford Green alone being designated as a SSSI. Paragraph 6.8 of the technical paper states that the SSSI relates to Ford Green Reedbed. Ford Green Reedbed Site of Special Scientific Interest (SSSI) was notified in 1990 under Section 28 of the Wildlife and Countryside Act 1981, as amended. It is managed by as a Nature Reserve by Stoke City Council.
IC071/540	Karen Watkins (Loggerheads)	The specific development needs of Loggerheads are relatively minor when compared to those of the Borough as a whole. It is	Noted. In accordance with national planning policy the Joint Local Plan must attempt to meet all the

	Parish Council & Neighbourhood Plan Working Group)	important to recognise that the need for new housing to support a growing urban population must not be satisfied by building in the rural areas, particularly in view of the lack of local job opportunities and the lack of any adequate public transport. New research findings published by CPRE show that new homes are built far more quickly on previously developed land than in open countryside. There will always be pressure from developers to use greenfield sites because they make higher profits; hence they exaggerate the problems of building on brownfield sites. In the research sample of 1040 developments, once work started brownfield sites took an average of 63 weeks to be completed against 92 weeks for greenfield sites. Unlike greenfield sites, brownfield sites are more likely to have services and transport links already in place	housing needs of the housing market area (HMA). Section 54 of the NPPF also requires the Joint Local Plan to be responsive to the local circumstances of rural areas and plan housing development to reflect local needs. This must be done in a sustainable manner by requiring housing to be located where it will enhance or maintain the vitality of rural communities, section 55 NPPF. It is also a requirement that the plan is deliverable. The SHLAA will be underpinned by a viability study which will assess the relative deliverability of both greenfield and brownfield sites across the two administrative areas.
IC079/608	Andy Perkin (on behalf of) Stoke Neighbourhood Forum	We recognise that there is a challenge in having to meet future development need and balance that against protecting and enhancing the natural environment, so it is important to have a robust strategy for assessing areas of biodiversity importance. 8.14 states that the JLP must be based on a clear strategy for recognising and protecting the most important local sites. That implies that the JLP will consider releasing for development local sites that are assessed as being less important. For this approach to be acceptable it is essential that the JLP secures a net gain for biodiversity and ensures the maintenance of coherent and resilient local ecological networks, as stipulated by the NPPF.  We are also concerned that biodiversity in urban areas, such as the Stoke NP area, could be sacrificed in favour of others further afield, leading to further erosion of our green space.	In accordance with national planning policy the Joint Local Plan will seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible. The sustainability appraisal will give consideration to the possibility of adequate mitigation measures if significant harm resulting from development appears likely. Biodiversity issues and evidence will inform further stages of JLP preparation. The JLP will seek to balance the effective development of brownfield sites with the Government's commitment to halt the overall decline in biodiversity, minimise impacts and provide net gains where possible, section 109 NPPF.

## Issue 2: Sustainable use of minerals

Reference	Consultee Name	Comments	Officer Comments
IC043/364	The Coal Authority	Comment – The Coal Authority will look for the Joint Local Plan to:  • Safeguard the entire surface coal resource in accordance with the	The first two matters are addressed by the Staffordshire and Stoke-on-Trent Minerals Plan, which was adopted on 16 February 2017. The

		<p>advice contained in paragraphs 143 and 144 of the National Planning Policy Framework. The mineral safeguarding area should be illustrated on the Policies Map. The policy on mineral safeguarding should adhere to the advice in Planning Practice Guidance and the BGS/The Coal Authority Guide to Mineral Safeguarding in England;</p> <ul style="list-style-type: none"> <li>• Establish a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in paragraphs 147 and 149 of the National Planning Policy Framework &amp; Planning Practice Guidance. This should include inclusion of criteria to address each of the 3 stages of hydrocarbon development and mineral policies should ensure that appropriate restoration is secured; and</li> <li>• Ensure that the site allocation methodology takes mineral sterilisation into account as a factor alongside other planning considerations.</li> </ul>	<p>councils will consult the Mineral Planning Authority (Staffordshire County Council) in relation to the safeguarding of economic mineral resources. Mineral safeguarding Areas are shown on the Policies and Proposals Map of the emerging Mineral Local Plan. The councils have been cooperating with the County Council for many years on mineral safeguarding issues.</p>
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Issue 3: The role of brownfield land in promoting biodiversity			
Reference	Consultee Name	Comments	Officer Comments
IC005/33	St Modwens	<p>This Issue picks up on the biodiversity potential of brownfield land. It is felt that in many cases the protection of ecological value of brownfield land can be retained alongside sensitive development. It is critical that any aims to protect the ecological value of brownfield land do not conflict with the Councils' and Government's aims of promoting a brownfield-first approach to development, and the potential for Planning Permission in Principle (PPiP) outlined within the emerging Housing and Planning Bill.</p> <p>7.2 There needs to be flexibility with the wording of any such policies to allow for the ecological value to be retained/replaced through differing means; on or off site – again to ensure that development is not sterilised or unnecessarily constrained as a result of ecological value.</p> <p>7.3 Again, without an overarching vision for economic growth then</p>	<p>The Joint Local Plan will seek to balance the effective development of brownfield sites with the Government's commitment to halt the overall decline in biodiversity, minimise impacts and provide net gains where possible, section 109 NPPF.</p>



		the value of ecology on brownfield sites is in danger of becoming overemphasised. The joint authorities must acknowledge that where there are competing demands, an overall aim must be in place to prevent conflicting policies.	
IC008/47	Natural England	<p>The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment (e.g. Hulme Quarry SSSI in Stoke (Park Hall Country Park) and Metallic Tileries SSSI in Newcastle). A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). New development should incorporate opportunities to enhance biodiversity, wherever possible.</p> <p>We welcome reference to:</p> <p>Issue 3: The role of brownfield land in promoting biodiversity</p> <ul style="list-style-type: none"> <li>• Ensuring future development strategies recognise the environmental value of brownfield land as well as greenfield sites.</li> </ul> <p>Natural England also welcomes the report's treatment of Brownfield sites (previously developed land) and in particular Issue 3 - The role of brownfield land in promoting biodiversity and its associated Key challenge - ensuring future development strategies recognise the value of brownfield land as well as green field sites.</p> <p>We note the Transport related brownfield issue regarding access for regeneration (p53). This indirectly reinforces the value of biodiversity mapping and/or the ecological assessment of brownfield sites i.e. to aid the 'sifting' process for any previously developed land that warrants protection and management for biodiversity at an early stage in the process so that the transport issues associated with these particular sites can be placed in context.</p>	Noted. We welcome the general support. Biodiversity and geodiversity issues and evidence will inform further stages of preparation of the Joint Local Plan. The Joint Local Plan will seek to balance the effective development of brownfield sites with the Government's commitment to halt the overall decline in biodiversity, minimise impacts and provide net gains where possible, section 109 NPPF.
IC016/204	Strategic Land Group	Finally, it also recognises the potential ecological value of previously developed sites which have naturally revegetated which is a key issue identified in the Joint Local Plan.	Noted. The Joint Local Plan will seek to balance the effective development of brownfield sites with the Government's commitment to halt the overall decline in biodiversity, minimise impacts and provide net gains where possible, section 109 NPPF.

## Issue 4 Protecting and enhancing landscape character

Reference	Consultee Name	Comments	Officer Comments
IC008/41	Natural England	<p>Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes; as well criteria based policies to guide development, as set out in the National Planning Policy Framework (NPPF). The Local Plan's policies and proposals should be informed by National Character Areas (NCAs). We therefore welcome the report's reference to relevant NCAs as follows:</p> <ul style="list-style-type: none"> <li>• NCA61 – Shropshire, Cheshire Staffordshire Plain</li> <li>• NCA64 – The Potteries and Churnet Valley</li> </ul> <p>NCAs divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. These should be supplemented by reference to a more detailed Landscape Character Assessment (LCA) of the plan area. The Staffordshire County Council Supplementary Planning Guidance document 'Planning for Landscape Change' forms the LCA for the joint local plan area. Such assessments can help in the selection of locations for development which involve the least harm to landscape character and guide policies on the design of development.</p>	Noted. The Staffordshire-wide SPG that forms the LCA for the Joint Local Plan Area can inform a more detailed LCA for the Plan Area. A more detailed LCA for the plan area has been the subject of discussion with Staffordshire County Council and a review is planned.
IC008/42	Natural England	<p>We welcome the following references to landscape issues in the joint local plan area accordingly:</p> <p>Natural and rural environment  Protecting and enhancing landscape character  Ensuring future development strategies safeguard characteristic landscapes in Newcastle-under-Lyme and Stoke-on-Trent, whilst taking opportunities to improve lower quality landscapes.</p>	Support noted. See also response to IC008/41 above.
IC009/116	Councillor Derek R Davies - NDP Steering Group	<p>Protection and maintenance of the Mosses sites is extremely important environmentally because of their carbon capture role. Peat bogs perform a far greater role as carbon sinks than do woodland.  Meece Brook</p>	Noted. The Councils are updating their evidence bases for the Joint Local Plan. Issues and evidence concerning biodiversity, the water environment and sustainable water management will inform further stages of Joint Local Plan preparation, along with

		<p>The Meece Brook originates in the Rural South. It has an important role in habitat networks and in flood mitigation and defence work both in and beyond NuL borough.</p> <p>Watercourses do not respect administrative boundaries.</p> <p>Urbanisation in the vicinity of the Meece Brook in NuL borough presents risks (e.g. from Baldwins Gate sewage works) to water quality downstream and to important Local Wildlife Sites beyond NuL borough.</p> <p>The Meece Brook is 'part of an important habitat network linking the borough to a diverse network of Local Wildlife Sites as well as areas such as Doxey Marshes SSSI and could therefore influence or be influenced by these habitats' (SWT, Biodiversity Opportunities Mapping, 3.5.1).</p> <p>Floodplains created on farmland along the Meece Brook in NuL borough contribute to the flood defences of Stafford borough.</p>	<p>its' SA/SEA. The draft Newcastle-under-Lyme Green Infrastructure Strategy makes references to ecosystems services, recognising the wide benefits of ecosystem services, in accordance with paragraph 109 of the NPPF.</p> <p>The contribution of the Meece Brook to the borough's green infrastructure will be carefully considered in the SA/SEA.</p>
IC009/117	Councillor Derek R Davies - NDP Steering Group	<p>The Rural South of NuL is the jewel in NuL's crown.</p> <p>Some landscape quality designations in Staffordshire County Council's 'Planning for Landscape Change' are cause for concern.</p> <p>An area in the Rural South, from south of Baldwins Gate to Madeley is designated as 'landscape restoration' that covers (1) ecologically important and significant wetland areas and (2) historic parkland. The designation has been assigned without any appreciation of the importance of this land in the wider landscape or in the ecology of the immediate area and areas beyond it.</p> <p>In contrast to 'Planning for Landscape Change', Staffordshire's 1958 County Development Plan identified 'Six areas of special landscape value', of which one included a large area in what is now referred to as NuL's Rural South: '(c) Maer and Hanchurch Hills (area about 22 sq. miles). The area extends from the Maer Hills at the north-west to Trentham Park at the north-east and includes Whitmore and Swynnerton Old Park. Towards the south-west the boundary extends to near Ashley and at the south it includes the villages of Maer and Swynnerton. Tittensor and Bury Bank are included at the south-east.'</p> <p>The Rural South is an area of great economic, topographical and environmental importance. It is vital for development in the Rural South to focus on appropriate land uses.</p>	<p>The identification of an area of landscape restoration by Staffordshire County Council seeks to ensure that any new development works to enhance and restore the rural landscape. In other words development can create an opportunity to improve the character of the landscape. However, the County's assessment of landscape character is subject to review and its replacement will be used to assess the impact of development on the rural area. The 1958 Development Plan is out of date and has no planning status.</p>
IC015/197	Richborough	<p>In addition, the Council's should update its technical evidence base</p>	<p>Noted. The Staffordshire-wide SPG that forms the</p>

	Estates	in respect of landscape character in the Newcastle rural areas to inform future policies which would replace the Newcastle 'Planning for Landscape Change' Supplementary Planning Guidance.	LCA for the Joint Local Plan Area can inform a more detailed LCA for the Plan Area. This is has been the subject of discussion with Staffordshire County Council and a review is planned.
IC017/210	Pochin Property	<p>We welcome the proposal in the Issues Consultation document to review policies relating to landscape character in the adopted Core Strategy. The site at Vernon Avenue in Audley is designated as part of an 'Area of Landscape Enhancement' under 'saved policy' N20 of the Newcastle-under-Lyme Local Plan. This designation of landscape quality is now however very dated having been identified in the 'Planning for Landscape Change' Supplementary Planning Document, adopted by Staffordshire County Council in 2000 and then carried forward in the Newcastle-under-Lyme Local Plan 2011. It covers a large area in the rural part of the borough of Newcastle-under-Lyme and needs to be reviewed.</p> <p>The purpose of the N20 Area of Landscape Enhancement designation is to ensure that development will not further erode the character or quality of the landscape. It therefore does not preclude development which can contribute towards landscape improvement. Given the site is surrounded by existing development on all sides and is effectively within the existing built extent of Audley, it is not considered to make a significant contribution to the objectives of Policy N20</p>	Noted. The Staffordshire-wide SPG that forms the LCA for the Joint Local Plan Area can inform a more detailed LCA for the Plan Area. This is has been the subject of discussion with Staffordshire County Council and a review is planned.
IC051/406	Environment Agency	Staffordshire Wildlife Trust has undertaken Biodiversity opportunity mapping for the Newcastle-under-Lyme and have adopted a Stoke and urban Newcastle Living Landscape initiative. These should form part of the Evidence Base for the development and delivery of relevant local plan policies	This is referenced in the Issues Consultation material and will continue to be taken in to account as preparation of the Joint Local Plan progresses.
IC060/431	Richard Oppenheimer	There is no reference to protecting natural carbon sinks in the rural area such as peat deposits and woodland the destruction of which can cause significant CO2 emissions and permanently damage areas which naturally capture and store carbon. This is a particularly relevant issue for NuL where the rural area encompasses the Woodland Quarter of Staffordshire and the West Midlands Meres and Mosses.	The specific function of woodlands and peat bogs as carbon sinks is not mentioned in the Issues Consultation material. However, Issue 1 'Increasing development needs and their impact on locally designated sites'; together with Issue 4 'Protecting and enhancing landscape character'; and Issue 6 'National and internationally designated wildlife and geological sites', highlight the environmental importance of these natural areas/habitats. Biodiversity and geodiversity (including

			management of soils) issues and evidence will inform further stages of preparation of the Joint Local Plan.
IC063/471	Judith Oppenheimer	A joined up network of wildlife corridors needs to be defined across the borough. Wildlife does not respect administrative boundaries. It needs to link into wildlife corridors in adjoining administrative areas, just as the highway network does.	Noted. NPPF requires local planning authorities to 'set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'. The draft Newcastle-under-Lyme Green Infrastructure Strategy, which includes consideration of biodiversity networks, will provide valuable evidence to guide policies which support ecological networks. Biodiversity issues and evidence will inform further stages of preparation of the Joint Local Plan.
IC071/541	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	It is of prime importance to Loggerheads to ensure that its exceptionally high quality landscapes are protected from insensitive development	Noted. The Staffordshire-wide SPG 'Planning for Landscape Change' that forms the LCA for the Joint Local Plan Area can inform a more detailed LCA for the Plan Area. This has been the subject of discussion with Staffordshire County Council and a review is planned. The Loggerheads Neighbourhood Plan can add value to strategic planning in Loggerheads, and identify the range of landscapes and townscapes that define the areas within the Parish, and supported by appropriate evidence, set policies for sustainable development within the NP area.

### Issue 5: Green Belt

Reference	Consultee Name	Comments	Officer Comments
IC008/43	Natural England	We welcome the following references to landscape issues in the joint local plan area accordingly:  Issue 5: Green Belt To ensure we deliver sustainable development by balancing the	Supporting comment noted.

		need to protect the openness of the Green Belt with the need to protect and enhance areas of value to the natural environment and local landscape	
IC009/112	Councillor Derek R Davies - NDP Steering Group	The Green Belt is having unintended consequences for the NuL rural area by creating pressure for development in the open countryside. Para.8.22 of the Issues Consultation paper draws attention to the pressures on 'the areas of highest quality landscape and best quality agricultural land within Newcastle-under-Lyme's rural area ... in countryside beyond the Green Belt boundary, where speculative development pressures are more likely'.	Supporting comment noted.
IC011/161	Thistleberry Residents Association	Green Belt would also appear to be considerably weakened by this Plan. 8.24 states that already there has been a deterioration in SSSI sites ( 76% in 2005; 36% in 2016). A disingenuous question asks why. As has been stated previously, the Plan and planning system are tools to prevent this happening -or is the plan just window dressing and the planning system just a way of going through the motions? Unfortunately, the term 'sustainability' appears to be used like a moveable feast	Unfortunately section 8.24 of the Issues Consultation document contains out of date material. The Natural and Rural Environment Technical Paper contains the correct information and confirms that the amount of designated sites have increased further between 2011 and 2015. SSSIs have increased by 2.4 ha in Newcastle-under-Lyme. The deterioration in the condition of SSSIs in Stoke-on-Trent is an entirely separate matter to Green Belt policy. Green Belt policy is not a landscape or natural environment policy but it often has the effect of protecting natural areas from development and because it constrains development in circumstances where there is not a five year supply it can put pressure on the open countryside. The Joint Local Plan is a genuine attempt to demonstrate a five year land supply and direct sustainable development to the most appropriate locations.
IC012/178	Keele University	In relation to the green belt, a boundary review is needed in order to ensure that, where needed; suitable green belt sites can be released to meet sustainable development needs. Such a review must start from the position that the protection of a designation (i.e. land as green belt) does not represent a credible planning strategy. A more appropriate strategy will take account of the quality and contribution of specific areas of green belt land and should consider whether the loss of such areas can be compensated for by, for	A Green Belt Review at this stage would be inappropriate as it assumes growth before any decision has been made about the Objectively Assessed Needs (OAN) or need for additional economic land. A Green Belt Assessment will be commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.

		example, the greening of previously allocated but economically unviable employment sites which might also have the advantage of being more accessible for recreational purposes than most existing green belt designated land.	
IC015/193	Richborough Estates	Whilst Richborough Estates consider that the Joint Local Plan Issues document broadly identifies the relevant planning issues, they are concerned that no Green Belt review has been undertaken at the outset. This is a fundamental evidence base document and of particular relevance given the acknowledged failure of the previous strategy of targeted regeneration which has demonstrably failed to deliver sufficient housing in the previous plan period.	It would be highly inappropriate to undertake a Green Belt Review before the evidence on land supply set out in the SHLAA is completed and decisions are made about growth options. To do otherwise risks the Local Plan being found unsound. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.
IC015/196	Richborough Estates	The Issues consultation document should also be informed by a Green Belt Assessment to identify opportunities for amendments to the existing Green Belt boundary without prejudice to the role and function of that Green Belt. This is a fundamental component of the Local Plan evidence base and should be considered alongside the emerging OAN figure. Whilst this key evidence base document may be undertaken in advance of the Options Consultation programmed for July/August 2016, this should be made publicly accessible at the earliest opportunity. This document is also of critical importance in identifying suitable strategies for ensuring the urban areas are not 'hollowed out' (as termed in the Joint Local Plan) by inadvertently increasing development pressures in rural areas outside the Green Belt.	A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF. The results of this assessment will be a key evidence document and would be made available to the public.
IC017/211	Pochin Property	The current Green Belt boundary in the Plan area is tightly drawn around existing urban areas. It therefore acts as a major constraint to development in the two authorities. Given the full objectively assessed need figure identified in SHMA, it is essential that the opportunity to review the Green Belt boundaries in a comprehensive and transparent way through the Local Plan is not wasted. Retaining Green Belt boundaries as existing will prevent the Local Plan from being able to provide effectively and sustainably for the future needs of the area. Whilst we appreciate the Plan is still at an early stage, it is inevitable given the above context that a thorough review of the Green Belt will have to be a fundamental part of the plan making	A single OAN figure has not yet been identified. Instead there is OAN range, which needs to be narrowed down so that growth strategy options can be identified. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.

		process from an early stage. The Issues Consultation document should have been more explicit in establishing this from the beginning.	
IC024/250	Mr J Poole	In Green Belt terms, should the Council carry out a Green Belt review, then it is considered that land around Lightwood would be suitable for release to meet objectively assessed housing needs.	No sites or locations for future development have yet been identified in the Joint Local Plan preparation process. The Strategic Options stage will begin to explore where in the plan area future housing development could be located.
IC027/271	Keele Parish Council	This section notes the pressures on 'the areas of highest quality landscape and best quality agricultural land within Newcastle-under-Lyme's rural area ... in countryside beyond the Green Belt boundary, where speculative development pressures are more likely', and we have already mentioned that the JLP is insufficient with regard to the rural economy. We believe more needs to be done to support a healthy rural economy.	Noted. It's not clear what is meant by a healthy rural economy i.e. more jobs or the need to support specific economic/employment sectors, but proposals which address rural issues including the condition of the economy in the rural area will be considered at the Strategic Options and Draft Plan stages. We welcome the Parish Council engaging with further stages of Joint Local Plan preparation.
IC030/287	Emery Planning	<p>Given the failure of past approaches to delivering housing need, it is considered that an alternative approach to housing delivery should be adopted in the emerging Joint Local Plan. Given the likely high housing requirement, the low market interest in previously developed sites and viability issues, it is considered essential that such an approach incorporates the use of sustainable greenfield sites and the use of land currently located with the Green Belt if housing need is to be met.</p> <p>A Green Belt review to identify potential sites for removal from the Green Belt that do not perform the purposes of the Green Belt, as identified in the National Planning Policy Framework (the Framework) is therefore considered to be required. It is therefore essential that the emerging Local Plan contains a policy that will allow for a review of Green Belt boundaries, and such a review is undertaken as part of the preparation of the Joint Local Plan.</p> <p>We therefore request that a housing delivery strategy in the emerging Joint Local Plan includes the use of greenfield sites on the edge of the existing built-up area, including the release of sites currently in the Green Belt. It is considered that this is essential if future housing requirements are to be met, as the current strategy of using previously developed land and land within regeneration areas in particular has failed.</p>	Support for a change to the overall development strategy is noted. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.



IC031/292	Renew Land Developments	Housing policies in the emerging Local Plan must be sufficiently flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green Belt.	The respective strategic housing land availability assessments (SHLAAs) of each council will set out the evidence on the amount of brownfield and greenfield land that is suitable, achievable and available and this evidence will be used to inform policy making and indicate the need for a Green Belt Review. In accordance with national guidance the process of identifying sites must test the appropriateness of previously defined constraints such as village envelopes. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.
IC031/294	Renew Land Developments	It is acknowledged that any outward growth of the City would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN figure. Prior to considering specific site allocations, the Council must ensure that it commissions a robust assessment of the Green Belt surrounding the urban areas in order to objectively determine the contribution that specific sites or areas make to Green Belt purposes	Noted. However, Issue 5 does not state that development of the Green Belt is required by the higher OAN. This cannot be determined until the final growth strategy has been identified, including as assessment of the land supply within the HMA. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.
IC033/310	Severn Trent Water	STW welcome the joint authorities' acknowledgement that the next development strategy will need to consider the effect Green Belt policy has in redirecting development to areas which may be of relative importance to the natural environment and landscape. 3.19 The Joint Local Plan provides an opportunity to review the boundaries of the Green Belt allowing Local Planning Authorities to assess whether land continues to meet the five purposes of including land within the Green Belt. Given the tightly drawn nature of the Staffordshire Green Belt and the effect it has had in restricting housing and employment development in and around Stoke-on-Trent and Newcastle-under-Lyme it is considered that the joint authority should undertake a comprehensive Green Belt review as part of the Joint Local Plan, identifying land which may be suitable to meet development needs.	Noted. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.
IC035/326	Mr Hussain	Housing policies in the emerging Local Plan must be sufficiently	See comments above in response to IC031

	(Knights)	flexible to allow the development of both brownfield and greenfield sites, and this in all likelihood will require development to take place outside of the existing settlement boundaries and is also likely to necessitate a review of the Green Belt.	
IC035/327	Mr Hussain (Knights)	It is acknowledged that any outward growth of Stoke-on-Trent and Newcastle-under-Lyme would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN figure. Prior to considering specific site allocations, the Council must ensure that it commissions a robust assessment of the Green Belt surrounding the urban areas in order to objectively determine the contribution that specific sites or areas make to Green Belt purposes.	The Issues consultation document describes the challenge of meeting higher levels of future development needs without harming the sustainability of the area but it does not propose development in the countryside. Nevertheless, Issue 4: Rural Service Centres explains that the village envelope policy will be reviewed as part of the Joint Local Process to consider if it remains up to date against the requirements of the NPPF.
IC036/332	Renew Land Developments	<p>It is acknowledged that any outward growth of the City would result in some encroachment into the countryside. Extensions to existing settlement boundaries will therefore be required in order to meet the area's housing requirements.</p> <p>The Council's must therefore give careful consideration to potential areas for growth and it is considered that:</p> <p>(a) The Key Rural Service Centres (including Loggerheads) must accommodate more (and a good proportion of) new homes to meet the housing requirements of the Joint Local Plan; and</p> <p>(b) The land at Tadgdale Quarry comprises a suitable, part-brownfield site for housing development and that an extension to the Loggerheads settlement boundary to include this site would be appropriate.</p>	See comment above re IC035. Redevelopment of Tadgdale Quarry was refused planning consent and has been the subject of a planning appeal public inquiry in January 2017. The Planning Inspectorate's decision is awaited.
IC037/337	Mr C Taylor and Mr S Taylor	<p>It is acknowledged that any outward growth of the City would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN figure.</p> <p>3.2 Prior to considering specific site allocations, the Council must ensure that it commissions a robust assessment of the Green Belt surrounding the urban areas in order to objectively determine the contribution that specific sites or areas make to Green Belt purposes.</p>	A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.
IC038/344	TFK Property	It is acknowledged that any outward growth of Stoke-on-Trent and	See comments above in response to IC037

	Limited	<p>Newcastle-under-Lyme would result in some encroachment into the countryside. Furthermore, some encroachment into the established Green Belt boundary will also be necessary to meet the higher OAN housing figure as well as employment allocations.</p> <p>Prior to considering specific site allocations, the Council must ensure that it commissions a robust assessment of the Green Belt surrounding the urban areas in order to objectively determine the contribution that specific sites or areas make to Green Belt purposes.</p>	
IC043/365	The Coal Authority	<p>At present the Local Plan highlights contaminated land as an issue but fails to mention unstable land in any context. As identified 9.72% of Newcastle-under-Lyme and 27.42% of the City of Stoke on Trent lies within the defined Coal Authority High Risk Development Area. Within these areas mining legacy features present a real risk to land instability and public safety such that it poses a potential constraint on development. The deliverability and viability of sites in these areas may be affected by the mining legacy features present.</p> <p>Mining legacy is concentrated in northern and eastern parts of the City of Stoke on Trent, although more isolated pockets of legacy also exist elsewhere across the City. Mining legacy in Newcastle-under-Lyme is concentrated in the north and centre of the Borough.</p> <p>The Coal Authority will look for the Joint Local Plan to:</p> <ul style="list-style-type: none"> <li>• Ensuring that future development is undertaken safely on land affected by land instability in accordance with the advice in paragraphs 109, 120, 121 and 166 of the National Planning Policy Framework &amp; Section 45 of Planning Practice Guidance; and</li> <li>• Ensure that the site allocation methodology takes land instability into account as a factor alongside other planning considerations.</li> </ul>	<p>Noted. Contaminated land and land instability are both factors that are taken in to account in both authorities SHLAAs. They will also be considered as part of the site selection process in advance of the preparation of the Draft Local Plan, in accordance with the requirements of the National Planning Policy Framework.</p>
IC052/415	NFU	<p>This policy should make a more specific reference to the need for agricultural businesses to develop within the Green Belt. Agricultural business located within Green Belt have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those</p>	<p>Issue 5 'Green Belt' is not aiming to establish policy but instead aims to highlight the role of the Green Belt and some of the impacts arising from development pressure, particularly beyond the Green Belt rather than the role of farming.</p>

		businesses located in other areas of the county. They may also need to diversify their businesses, perhaps by supplying local produce through farm shops or by developing a tourism offer. Other Authorities have recognised the need for new small-scale economic development in the rural economy and for farm diversification schemes. Even if the support for businesses in these areas is implied by your current policy wording, it ought to be more stridently expressed within the plan. We would like to see a can do attitude to development that recognises that farming businesses have an essential role in maintaining the local landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes.	Nevertheless responsible farming can have a positive impact on the environment and this will be given consideration in the emerging Joint Local Plan including the need for diversification.
IC071/542	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	We believe that any development of green belt land should only be considered in exceptional circumstances as envisaged by the NPPF.	Comment noted. Any future Joint Local Plan policies relating to Green Belt will have to accord with the requirements of the NPPF. This will include the exceptional circumstances for amending Green Belt boundaries as set out in NPPF paragraph 83 (N.B. decisions on development proposals within Green Belt are covered under 'very special circumstances' in paragraph 88 of the NPPF).
IC072/547	Dean Lewis (Tim Dean)	If the City and Borough are to succeed under their duty to cooperate to deliver the necessary housing and economic prosperity that the area needs, then extent of Green Belt must be reviewed. As presently drawn, it stymies any realistic prospect of the full objectively assessed needs of the conurbation being met. The consequence of such failure would result in economic deprivation, poor social living conditions and a missed opportunity to bring about genuine net gains in all three dimensions of sustainable development. Both the City and Borough must recognise that whilst brownfield regeneration has a major role to play in bringing about economic prosperity, both Council's must also fully recognise that in the absence of a strategic review of green belt boundaries, the growth ambitions cannot be met with brownfield regeneration alone. The consequence of not reviewing the Green belt would result in serious social and economic harm to the area.	Noted. A Green Belt Assessment has now been commissioned to assess how well the Green Belt is performing against the five purposes of the Green Belt as set out in the NPPF.
IC072/565	Dean Lewis (Tim Dean)	The I&O identifies that the urban area of Newcastle-Under-Lyme and Stoke-on-Trent is tightly bound by Green Belt. This policy	Observational comments noted.

		designation was designed to prevent urban sprawl by keeping land permanently open, by protecting them from inappropriate development pressures. Further, the I&O also appropriately acknowledges that the Green Belt is not a landscape or natural environment policy. Protecting natural areas from development is a consequence of its spatial function.	
IC076/579	W Naylor	Is it in the remit of JLP to be able to alter Green Belt boundaries? Seems a dangerous precedent for many vulnerable Green Belt protected urban margins.	Yes, section 83 of the NPPF makes it clear that local planning authorities should use Local Plans to establish Green Belt boundaries.

### Issue 6: National and internationally designated wildlife and geological sites

Reference	Consultee Name	Comments	Officer Comments
IC008/45	Natural England	Issue 6: National and internationally designated wildlife and geological sites Key message: The presence of internationally designated environmental sites within and near to Newcastle-under-Lyme and Stoke-on-Trent will be carefully considered in planning future development Key challenge Making sure any future development strategy protects rare species and designated sites.	Observational comment noted (Statement taken directly from the Issues Consultation Document)
IC008/46	Natural England	The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced. The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as	Noted. These comments relate to specific aspects of the plan preparation process. The Council's will consult with Natural England in considering future development options.

		<p>amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary e.g. the Midland Meres and Mosses Phases 1 &amp; 2 Ramsar Sites which are spread over the Newcastle-under-Lyme, Stafford, Cheshire East and Shropshire authority areas.</p> <p>We note the report's commentary on the decline in the extent of SSSI within the joint local plan area in 'favourable' or 'unfavourable recovering' condition. Natural England will review the data presented in table 1 on page 12 of the 'Natural &amp; Rural Environment' technical paper and report separately on any narrative needed to explain this apparent trend.</p> <p>Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.</p> <p>The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Natural England's Impact Risk Zones, relating to designated sites, is another useful tool to identify risks associated with different types of development. Natural England has also produced Site Improvement Plans (here) for European sites which provide an overview of the issues affecting the condition of the site(s) and outlines the priority measures required to improve the condition of the features. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.</p>	
IC009/114	Councillor Derek R Davies - NDP Steering Group	<p>A joined up network of wildlife corridors needs to be defined across the borough. Wildlife does not respect administrative boundaries. It needs to link into wildlife corridors in adjoining administrative areas, just as the highway network does.</p>	<p>The Newcastle-under-Lyme Green Infrastructure Strategy will identify opportunity to create wildlife corridors and policies will be developed to take this into account as far as possible. A Green Infrastructure Strategy is in the process of being prepared for Newcastle-under-Lyme.</p>

## Issue 7: Future maintenance of Green Infrastructure

Reference	Consultee Name	Comments	Officer Comments
IC008/49	Natural England	<p>We welcome the report's recognition of multi-functional green infrastructure at para 8.9 and the key challenge that creation, management, protection and enhancement of such a resource may represent in the context of increasing demand for land for development.</p> <p>Green infrastructure is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation and adaptation, food production, wildlife habitats and health &amp; well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>Green infrastructure is also relevant in a rural context, where it can refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.</p> <p>A strategic approach for green infrastructure networks should support a similar approach for ecological networks, as outlined above. Evidence of a strategic approach can be underpinned by means of a Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included within a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.</p>	Noted. Both councils are updating their evidence relating to green infrastructure and a Green Infrastructure Strategy is in the process of being prepared for Newcastle-under-Lyme.
IC009/121	Councillor Derek R Davies - NDP Steering Group	Access to the countryside brings the inevitable risk of wear and tear on the environment. Clear designation and signposting of footpaths and other accessible areas and regular inspection and maintenance of such areas are a must. Likewise, users of the	It is not the remit of the Joint Local Plan to address these issues, which are mainly concerned with the management and maintenance of the countryside. These are the responsibility of Staffordshire County

		<p>countryside need guidance on respect for the environment and the proper use of footpaths and other facilities.</p> <p>Litter is a serious problem. Not only is it unsightly, but it is a danger to livestock and to wildlife. A real educational programme needs to be put into place to improve the problem, together with strong enforcement measures. Litter bins need to be provided outside shops and wherever there are seats, picnic tables and parking bays.</p>	Council and landowners.
IC049/388	Woodland Trust	We would like to see the Local Plan include provision to include trees and woodland as part of developer obligation delivery to maintain natural green space and green infrastructure into the future.	Noted, but strict rules on planning obligations (which aim to collect financial contributions) set out in Community Infrastructure Levy (CIL) Regulations 2010 mean that only limited site specific infrastructure can be funded through section 106 contributions. Site specific planning policies or planning conditions may be a more appropriate tool to protect on site trees and woodland.
IC052/416	NFU	Farmers and landowners must be fully engaged with discussions on Green Infrastructure as they own and manage many of the areas key Green Infrastructure assets. For many farmers environmental management is a core business activity, but this is not acknowledged by the document. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride and it does them a disservice to not have this aspect of land management recognised by this paper. Farmers who do not (for a variety of reasons) participate in agri-environment schemes also make valid contributions. The work of the Campaign for the Farmed Environment ( <a href="http://www.cfeonline.org.uk">www.cfeonline.org.uk</a> ) has shown that these farms use a range of voluntary techniques to enhance the options and that this management is funded by farm businesses.	Noted. The role of the farming community in maintaining the landscape is acknowledged but the JLP is a land-use plan and not a land-management plan, therefore land management practices per-se are not required to be included in the JLP. We welcome further engagement from the NFU, particularly in relation to agri-business matters and GI, on further stages of Joint Local Plan preparation.
IC071/543	Karen Watkins (Loggerheads Parish Council & Neighbourhood Plan Working Group)	It is recognised that pressures on local government finances will require enhanced involvement by parish councils and voluntary resources to ensure that the infrastructure is suitably managed.	Noted. The Loggerheads Neighbourhood Plan is able to directly address this.



## Natural & Rural Environment Technical Paper

Reference	Consultee Name	Section	Comments	Officer Comments
IC063/472	Judith Oppenheimer	Paras 6.11 and 6.12	<p>Paras 6.11 and 6.12 of the technical paper state: 'The vast majority of the rural area to the west of Newcastle-under-Lyme lies within Grade 3 land ... Isolated areas of Grade 2 land are also present within the borough, particularly to the south-west of the borough in the area to the west of Loggerheads.</p> <p>'Therefore there is some potential for further land falling under the definition of "best and most versatile" agricultural land to be present in Newcastle-under-Lyme's rural area ... the limited amount which can be identified does not adjoin any major settlement within the rural area, so such land may be less likely to come under pressure from speculative development.'</p> <p>The Agricultural Land Classification for England shows Grade 2 agricultural land immediately to the north of and adjoining Baldwins Gate village. A 5.6ha area of Grade 1 and Grade 2 agricultural land in this location was lost to housing development in 2015. In order to prevent further losses of valuable agricultural land it is essential for NuL to have planned development.</p>	Noted. See comments in response to IC009/118 above.



## Schedule of Comments- Energy and Climate Change

General Comments: Energy and Climate Change			
Reference	Consultee Name	Comments	Officer Comments
IC008/54	Natural England	<p>The Local Plan should include proactive strategies to mitigate and adapt to climate change. This should be based on an understanding of the risks climate change poses to the area, including an understanding of which areas are vulnerable to the range of impacts arising from climate change.</p> <p>Any adaptation strategy should recognise both the role the natural environment can play in delivering climate change adaptation measures (e.g. green infrastructure provision to moderate urban heat island effects), and the need to assist biodiversity to adapt (e.g. improving habitat connectivity).</p> <p>Any mitigation strategy should recognise the role the natural environment can play in carbon retention and sequestration in soils and habitats.</p>	Noted. Consider the role of the natural environment in delivering climate change adaptation measures, informed by the borough's Green Infrastructure Strategy. Consideration will also be had to the evidence required to inform the stages of the plan to follow.
IC009/123	Councillor Derek R Davies - NDP Steering Group	<p>Protection of natural assets which sink carbon is largely a planning issue. It requires that planners recognise that the destruction of natural carbon sinks constitutes a high degree of harm to the extent that developers cannot be allowed to build on carbon sink areas.</p> <p>Document comment:</p> <p>There is no reference to protecting natural carbon sinks in the rural area such as peat deposits and woodland the destruction of which can cause significant CO2 emissions and permanently damage areas which naturally capture and store carbon. This is a particularly relevant issue for NuL where the rural area encompasses the Woodland Quarter of Staffordshire and the W. Mids. meres and mosses</p>	<p>While the protection of natural assets is a consideration for planning and the ecosystem functions they provide, including carbon sequestration. Land management/agricultural practices also play an important role. Furthermore mitigation measures may mean that some limited development may be possible.</p> <p>Although the specific function of woodlands and peat bogs as carbon sinks is not mentioned in the Issues Consultation material, the environmental importance of these natural areas/habitats is described in Chapter 8 Natural and Rural Environment, including some areas benefiting from statutory protection. The functions natural assets provide will continue to be given consideration.</p>
IC009/128	Councillor Derek R Davies - NDP	Electricity generation accounts for about a third of carbon emissions. The scope for large scale renewable generation in the	Ideas noted.

	Steering Group	<p>plan area is limited and it is likely that wind has the most potential. A number of sites in the plan area have been identified as having high average wind speeds. However, solar and biomass also have potential. Solar microgeneration can utilise building roof space assuming that buildings are constructed with adequate south facing aspects. Larger scale PV installations may be proposed where they are commercially viable. Flat-roofed industrial buildings also offer potential for PV installations. Biomass requires both the appropriate generation installations and the growing of suitable energy crops nearby as biomass is generally bulky and it is not viable or sustainable to transport it large distances. Biomass production may however conflict with food production.</p> <ol style="list-style-type: none"> <li>1. Need to identify potential for micro generation in the rural area and suitable schemes.</li> <li>2. Identify sites suitable for wind generation based on national wind maps. Adopt a policy on agricultural farm wind turbines, to enable at least some wind generation in the face of public opposition to wind farms.</li> <li>4. Consider the possibility of requiring developers to invest in renewable electricity schemes outside of the plan area that can be counted towards the plan area's renewable energy contribution.</li> </ol>	
IC011/162	Thistleberry Residents Association	There is no mention of solar power or hydrogen as an energy source.	It is not the aim of the Issues Consultation document to set out all potential renewable energy sources. However, the volatile nature of hydrogen probably rules it out as a reliable source of energy for domestic purposes within the plan period.
IC060/430	Richard Oppenheimer	<p>Overall there is little coherent structure to the document – nor a consistent story as to how the issues around Energy and Climate Change (ECC) are to be tackled.</p> <ol style="list-style-type: none"> <li>a) Protecting natural carbon sinks such as woodland, peat deposits, heathland, which have both a nett negative effect on emissions and retain water so helping to mitigate flooding.</li> <li>b) Encouraging energy efficiency in terms of buildings – both existing and new.</li> <li>c) Energy efficiency in transport both in terms of reducing the need for transport and promoting low emission methods of transport</li> <li>d) Reducing the emissions caused by electricity generation – by promoting microgeneration, enabling the development of industrial</li> </ol>	At this early stage the councils deliberately did not try to propose solutions to the ECC issues but only set out to highlight the most significant issues, as explained in the Introduction at 1.36.

		scale renewable generation in the plan area, finding ways to import low carbon electricity into the plan area. For example by requiring developers to make contributions to renewable energy projects. e) Mitigating the effects of climate change, most notably flooding but also changes in agricultural land use necessitated by climate change e.g. flood plains and creation of land areas which retain water.	
IC051/397	Environment Agency	There is no reference to the Water Framework Directive within this document. The EU Directive cuts across a number of topics within the Natural Environment and should underpin much of the improvements sought in relation to watercourses and water in general. There is a requirement for all waterbodies to reach 'Good' Status by 2027 and there should be no deterioration in quality within that period. The Water Framework Directive is implemented by evidence from the River Basin Management Plan, in this case the Humber, and is then split into catchments with its own specific actions.	Noted. WFD will be a consideration for relevant evidence documents and will inform the stages of the plan-making process to follow.
IC060/433	Richard Oppenheimer	9.5 – What about emissions standards (both noise and greenhouse gases) from buses and HGVs? This is a significantly neglected area and there should be a policy of adopting low emission zone standards within the plan area.	The JLP cannot influence emission standards. Establishing a low emission zone tends only to be feasible in very large urban areas due to the practicalities and cost of managing such a scheme.
IC060/437	Richard Oppenheimer	9.6 I suspect that the potential for deep geothermal heat in this area is low but not zero (possibly from old mine workings). What studies are available?	Opinion noted. However, it is not for the JLP to investigate the potential for individual forms of energy generation. With regards to renewable energy generation the NPPF and Local Plan policies provide support, providing proposals do not conflict with other policies.

### Issue 1: Renewable energy and energy efficiency measures in new development

IC003/8	Stoke-on-Trent Public Protection	Need to stress that impact on air quality should be given due consideration when considering renewable energy as biomass can result in particulate emissions.	Noted. If specific allocations or policies are to be included through the Local Plan for energy from waste consideration will be had to air quality.
IC009/124	Councillor Derek R Davies - NDP Steering Group	new buildings by modifying existing ones. However, given that there is a considerable stock of old buildings in the plan area simple measures which improve energy efficiency must be	Noted

		<p>encouraged where practical. To a large extent this is already taken care of by mitigation schemes run by energy companies. Buildings can be either commercial or residential and the issues of energy efficiency apply to each.</p> <ol style="list-style-type: none"> <li>1. Smaller developments can be more innovative and flexible in terms of incorporating microgeneration and energy efficiency measures.</li> <li>2. District heating schemes are unlikely to make a significant impact on the overall energy budget because they require buildings to be sited close to sources of waste heat. This is more likely to be the case on industrial estates. The infrastructure required to carry hot water or steam is expensive to install and potentially difficult to maintain – such schemes may be viable on industrial estates or residential developments or new developments which are sited close to sources of waste heat. This highlights the importance of siting housing close to areas of employment. The potential to use waste heat for residential heating is just one of several ECC benefits of the close siting of residential and employment areas.</li> <li>3. It may be difficult to obtain planning permission for the replacement of existing buildings in the rural area with modern energy efficient buildings because of policies which, for example, only allow replacement buildings within existing curtilages. Planning policies should be more flexible make it easier for people to get planning permission for developments of this type. For example, re-siting a replacement building may improve the prospects for solar or ground source.</li> <li>4. Buildings can be designed and positioned to make the most of solar energy both in terms of electricity microgeneration and heating (solar gain).</li> </ol>	
IC009/125	Councillor Derek R Davies - NDP Steering Group	<p>District heating is not a form of renewable energy, neither is district heating a justification for larger developments. Smaller developments can benefit from design best practice, such as planning for sufficient south facing roofs to maximise potential for solar energy collection.</p> <p>“If the government’s ‘zero-carbon homes’ policy is ended, this may further limit both councils’ ability to deliver energy efficiency in new development.” Is untrue - very few zero carbon homes were ever built and best practice building can deliver greater overall energy</p>	<p>First point noted.</p> <p>With regards to zero-carbon homes, this involved a change towards a requirement for all homes to meet a particular efficiency standard. Energy performance requirements are now largely addressed under Building Regulations.</p> <p>Para 9.13 of the Issues document addresses the</p>

		<p>savings.</p> <p>9.18 District heating will only ever be viable in localised high density areas. And can only be considered viable in locations where there are large sources of waste heat. It could be viable in some parts of SoT, where I believe it is mentioned as a possibility; but it has limited application.</p> <p>S106 agreements could include contributions to renewable energy schemes elsewhere.</p>	third point.
IC009/129	Councillor Derek R Davies - NDP Steering Group	<p>I cannot understand why “Smaller residential developments in both areas can struggle to deliver renewable energy schemes and energy efficiency measures, particularly due to the associated costs.” – this is manifestly untrue. All they need is solar roofs.</p> <p>9.6 I suspect that the potential for deep geothermal heat in this area is low but not zero (possibly from old mine workings). What studies are available?</p>	Para 9.14 of the Issues document addresses this point.
IC027/273	Keele Parish Council	We would like to see more emphasis on the building of energy efficient homes where development is permitted.	This comment appears to be seeking new policies that improve the energy efficiency of homes over and above current regulations. With regards to this, The Energy and Planning Act 2008, as a result of the Deregulation Act 2015, no longer provides local authorities with the ability to set policies for new dwellings that exceed the energy efficiency standards required by building regulations. The effect of this regulatory change will have to be considered and, if scope for such a policy should exist, the impact on the viability of development will need to be taken into account but the sentiment is noted.
IC032/300	United Utilities	<p>We note that Chapter 9: Energy and Climate Change of the consultation document makes no reference to water efficiency measures. Whilst we appreciate the Code for Sustainable Homes has now been scrapped as a result of the Government’s ‘Housing Standards Review’ consultation, we suggest the emerging Joint Local Plan includes a new policy regarding water efficiency measures and the design of new development as follows:</p> <p>“The design of new development should incorporate water efficiency measures. New development should maximise the use of permeable surfaces and the most sustainable form of drainage,</p>	The preparation of development management policies which consider water efficiency will be undertaken at the Draft Plan stage. Take into account at the Draft Plan Stage.

		<p>and should encourage water efficiency measures including water saving and recycling measures to minimise water usage.”</p> <p>United Utilities wishes to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. Water efficiency measures contribute to the delivery of sustainable development.</p>	
IC052/417	NFU	<p>Many farmers are considering opportunities for investing in renewable energy production. This could include; roof mounted solar panels, wind, Anaerobic digestion or growing Biomass (for local heating etc). These farms represent a significant opportunity for the area to produce renewable energy. The document should actively encourage this activity as it presents many opportunities for tackling the effects of climate change and reducing local reliance on fossil fuels.</p>	<p>The preparation of development management policies which consider contribution of renewables to sustainable development will be undertaken at Draft Plan stage. Take into account at the Draft Plan Stage.</p>
IC058/427	Steve English	<p>Where any new( and in particular high value) housing is preferred to be built in rural locations it should be more energy efficient and benchmarked as such using an independently assessed nationally system such as the code for sustainable homes levels 4 or 5 or passivehaus. Setting the politics aside, it is a scientific fact that the energy savings will more than offset the carbon footprint due to any perceived reliance on public transport.</p>	<p>This comment appears to be seeking new policies that improve the energy efficiency of homes over and above current regulations. With regards to this, The Energy and Planning Act 2008, as a result of the Deregulation Act 2015, no longer provides local authorities with the ability to set policies for new dwellings that exceed the energy efficiency standards required by building regulations. The effect of this regulatory change will have to be considered and, if scope for such a policy should exist, the impact on the viability of development will need to be taken into account but the sentiment is noted.</p>
IC060/432	Richard Oppenheimer	<p>9.13 District heating is not a form of renewable energy, neither is district heating a justification for larger developments. Smaller developments can benefit from design best practice, such as planning for sufficient south facing roofs to maximise potential for solar energy collection.</p> <p>“If the government’s ‘zero-carbon homes’ policy is ended, this may</p>	<p>While District Heating is not a pure form of renewable energy it provides opportunities for renewable forms of energy (e.g. solar or wind) to contribute to the energy produced. The issues document is not attempting to justify the need for larger developments, it recognises that district</p>

		<p>further limit both councils' ability to deliver energy efficiency in new development." Is untrue - very few zero carbon homes were ever built and best practice building can deliver greater overall energy savings.</p> <p>9.18 District heating will only ever be viable in localised high density areas. And can only be considered viable in locations where there are large sources of waste heat. It could be viable in some parts of SoT, where I believe it is mentioned as a possibility; but it has limited application.</p>	<p>heating will undoubtedly be costly and economies of scale are likely to apply. The Background to the ECC chapter at 9.8 the JLP identified the need to ensure that a number of infrastructure methods are considered.</p> <p>With regards to zero-carbon homes, this involved a change towards a requirement for all homes to meet a particular efficiency standard. Energy performance requirements are now largely addressed under Building Regulations.</p> <p>Opinion noted.</p>
IC060/436	Richard Oppenheimer	I cannot understand why "Smaller residential developments in both areas can struggle to deliver renewable energy schemes and energy efficiency measures, particularly due to the associated costs." – this is manifestly untrue. All they need is solar roofs.	Para 9.14 of the Issues document addresses this point.
IC060/439	Richard Oppenheimer	Much of the document addresses transport and air quality issues rather than genuine energy and climate change issues.	Many other issues are covered within the document. For example Issue 1 examines energy efficiency in new and existing buildings.
IC069/512	Neil Dawson	In Energy and Climate change there should be local targets for renewable s and other carbon reductions	This comment appears to be seeking new policies that improve the energy efficiency of the plan area and the generation of energy through renewables. While there is some scope for local targets The Energy and Planning Act 2008, as a result of the Deregulation Act 2015, no longer provides local authorities with the ability to set policies for new dwellings that exceed the energy efficiency standards required by building regulations. The effect of this regulatory change will have to be considered and where scope exists for such policies their impact on the viability of development will need to be taken into account but the sentiment is noted. Take into account at Draft Plan stage.
IC073/568	Jason Barnett	Renewable energy is another issue I think could be addressed, seeing as though Britain has to meet renewable energy targets before 2020 (20% renewable energy by 2020 if I'm correct). I think local government should be encouraging householders to apply for	There is no evidence that a hydro scheme would be feasible within the rural area. The speed of flow or volume of water is unlikely to generate sufficient energy that could be harnessed on any scale.



		renewable energy grants so we can all reduce our carbon footprint. In Madeley, which is where we live presently, I think we have an opportunity for Hydro power to produce clean energy. We have the River Lea which feeds the local pool, and it also runs under the road at the bottom of Moss Lane, therefore as it flows under the road it drops quite considerably which I'm sure could harness a hydropower system producing green electric, whilst also returning an income for the borough council.	Householders could investigate the potential of hydro power from water courses on their land. However, the Staffordshire County wide Renewable / Low Carbon Energy Study (2010) mentioned two possible development sites identified as part of a recent national Environment Agency study.  Action to contact the Environment Agency with regards to the sites identified.
IC079/609	Andy Perkin (on behalf of) Stoke Neighbourhood Forum	This section rightly recognises that existing housing "performs poorly in terms of energy efficiency" but seems to fail to take into account embedded energy in assessing the effects of 19th Century housing on energy usage. While recognising the need to improve the efficiency of local terraced housing, there also needs to be some recognition of the social impacts in these being the only type of housing that many can afford. Terraced houses cannot be rebuilt for the selling prices they can be acquired at, even if developers were willing to consider it.	The social, financial and environmental implications of planning policies will be considered together at the Draft Plan Stage. However, retrofitting 19 century terraced housing with renewable energy technologies is beyond the remit of the Joint Local Plan.

## Issue 2: Poor energy efficiency in existing housing

Reference	Consultee Name	Comments	Officer Comments
IC034/322	Historic England	Issue 2: Poor energy efficiency in existing housing – The first point of the Key Challenge for this issue should include reference to taking the impact on the historic environment into consideration as part of addressing energy efficiency issues in existing housing stock.	Paragraph 9.16 identifies an issue that is relevant to the area. As the plan progresses the issues surrounding the potential impacts if the plan is to address this issue will need to be considered, including impacts for the historic environment.
IC040/350	Gordon Lancaster - Madeley Conservation Group	Insufficient emphasis on design including appearance and energy saving. This affects the community over many Local Plan periods and cannot easily be improved later.	Unclear how to interpret comment but it appears that concern is being expressed about the way in which renewable energy can potentially have a harmful impact on the physical appearance of property. Development Management policies to manage design will be developed at the Draft Plan stage.

### Issue 3: Air Quality and sustainable transport solutions

Reference	Consultee Name	Comments	Officer Comments
IC003/7	Stoke-on-Trent Public Protection	Reference is made to the "entirety of Stoke-on-Trent being identified as an Air Quality Management Area". This needs to be put into context as the current phrasing gives the impression that the whole of Stoke-on-Trent has an air quality problem. The Air Quality Management Area relates specifically to nitrogen dioxide. Stoke-on-Trent, like other major cities, has areas where the air quality objectives for nitrogen dioxide are being breached.	Noted.
IC003/9	Stoke-on-Trent Public Protection	In paragraph 9.21 and 9.22 reference is made to carbon emissions from transport and road traffic emissions, but no mention of nitrogen dioxide or particulates. In paragraph 9.22 reference is also made to " numerous areas...failing to meet air quality standards." This is not a true representation of our air quality status and should be changed to read some major junctions and congested roads are failing to meet air quality standards	Noted.
IC008/52	Natural England	We note and welcome the report's reference to air pollution in terms of vehicle emissions and sustainable design of new developments. We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a	Noted. The JLP at Draft Plan stage will be the subject of a Strategic Environmental Assessment (SEA) and an assessment under the Habitat Regulations (HRA).

		greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic <sup>3</sup> , which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.	
IC009/126	Councillor Derek R Davies - NDP Steering Group	<p>Transport typically accounts for around 30% of the total energy budget. Due to the heavy reliance on fossil fuels it contributes disproportionately to carbon emissions but also to other emissions such as NOx, particulates and ozone which diminish air quality and to noise.</p> <p>1. Provision of electric car charging points – not mentioned. 2. Public transport is only energy efficient if it achieves a high utilisation. Empty buses are significant polluters and causes of congestion.</p> <p>3. Electric cars and plug-in hybrids are becoming increasingly popular, and will become more so during the lifetime of this plan. There is no mention of electric car charging points which are an essential enabler.</p> <p>4. Reducing the need to commute to work particularly in rural areas will have a significant impact on the number of road miles generated. Encouraging the development of rural businesses can help here.</p>	The Issues consultation document deliberately focusses on strategic issues which have implications on land use/take of development and its spatial distribution, rather than specific design details. The design of development will be managed through development management policies prepared at the Draft Plan Stage. Note comment on encouraging rural enterprise but this needs to be considered against the risk of encouraging travel from the urban area which may have undesirable consequences.
IC009/127	Councillor Derek R Davies - NDP Steering Group	<p>SA3 – Supporting the development of rural businesses which reduce the need to travel from the Rural South into Stoke and Newcastle.</p> <p>9.5 What about emissions standards (both noise and greenhouse gases) from buses and HGVs? This is a significantly neglected area and there should be a policy of adopting low emission zone standards within the plan area.</p> <p>Issue 3 – buses are only energy efficient if they are fully utilised. Empty buses contribute significantly to emissions, noise and traffic congestion. Operators should be encourage to make more use of smaller and more energy efficient vehicles as part of a more flexible transport network better able to support the needs of the polycentric area.</p>	See comment above (IC09) r.e. the risk of increasing more rural businesses. The type of buses run by operators and their timetables is beyond the scope of the JLP.

		4.3 Bus services – need to recognise that there needs to be a review of where bus routes are, following a long period of decline and no attempt to identify travel need patterns and introduce more flexible routing and on-demand services.	
IC009/131	Councillor Derek R Davies - NDP Steering Group	Air quality is not directly an ECC issue although emissions which cause climate change can also impact on air quality in other ways such as nitrous oxide (NOx), particulates and ozone. These matters need to be addressed in the document in their own right. Document comments: 1. Much of the document addresses transport and air quality issues rather than genuine energy and climate change issues.	Air quality is a cross cutting environmental issue and similarly transport is a cross cutting issue. Consider that the inclusion of these issues within the ECC chapter was appropriate. However at the Draft Plan stage, where necessary, individual policies will be developed for each of these topic areas.
IC041/357	Network Rail	Issue 3: Air quality and sustainable transport solutions  9.21 Equally, issues exist in the variable quality of the public realm and walking environments in the urban area, where poor urban design and busy roads can act as a barrier to walking. On the other hand, use of the local rail network is increasing, but overcrowding due to lack of capacity remains an issue. These problems within existing modes of sustainable transport present a challenge to reducing vehicular emissions. Consequentially Stoke-on-Trent and Newcastle-under-Lyme both produce significant amounts of carbon emissions each year from road transport.	Noted.
IC049/389	Woodland Trust	We would like to see Local Plan include the role that woods and trees can play in improving local air quality.	It is unfortunate that more information isn't provided on how woods and trees can impact on air quality but point is noted and the ecosystem functions of woods and trees will be considered as the Plan progresses.
IC060/434	Richard Oppenheimer	Buses are only energy efficient if they are fully utilised. Empty buses contribute significantly to emissions, noise and traffic congestion. Operators should be encourage to make more use of smaller and more energy efficient vehicles as part of a more flexible transport network better able to support the needs of the polycentric area.	The type of vehicles used by bus operators cannot be influenced by the JLP.
IC080/612	Nicky Davis	Brown field sites should be prioritised, as rightly seems to be in the draft plan but we must protect valuable green spaces. Access to the natural environment is good for health and well-being of residents. I would like to see further enhancement of these. Very good improvements have been made in Trentham with the	Support for brownfield development noted. The Open Space Strategy and Green Infrastructure Strategy will take into account health and well-being and opportunities to secure and enhance the areas greenways will be considered as the plan

		greenway but it would be good to carry on improvements, for example the path beside Longton Brook. Also, I have not had time to read the over 90 page document fully but it seems more could be made in terms of assets of community value and how these relate to green spaces.	progresses.
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**Issue 4: Flood Risk**

Reference	Consultee Name	Comments	Officer Comments
IC005/34	St Modwens	While the general approach of locating development outside the areas of high risk of flooding, given the ever reducing land-availability, there should be recognition that sometimes development on land within Flood Risk zones 2 or 3 can be appropriate, providing appropriate mitigation and flood protection measures are incorporated as set out within the NPPF. As such the policy, whilst generally encouraging development on land in the lowest areas of flood risk, should acknowledge there can be appropriate development outside these areas. Further the Councils should seek to proactively facilitate discussions between developers and the relevant flooding bodies to fully explore appropriate means of developing within zones of medium or high flood risk.	The ECC introduction at 9.9 does acknowledge that where sustainability considerations clearly outweigh flood risk then development in areas at risk of flooding can be considered.  Consideration will be had to flood risk evidence while the plan progresses (e.g. SFRA). This evidence will inform a sequential approach to potential locations for development and the application of the exception test, if necessary. The Environment Agency and Staffordshire County Council flood risk team will also advise on the appropriateness of locations for development.
IC008/53	Natural England	Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 100-104 of the NPPF. The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available here) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.  The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement.	Noted. Consideration will be had to evidence relating to this topic (SFRA and Water Cycle Study).

		<p>Priority for enhancements should be focussed on Natura 2000 (European) sites, SSSIs and local sites which contribute to a wider ecological network.</p> <p>Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of Sustainable Drainage Systems (SuDS) to achieve this.</p> <p>The NPPG provides further guidance on information sources for the water environment which should be used to inform the Local Plan and the SA/SEA.</p>	
IC009/130	Councillor Derek R Davies - NDP Steering Group	<p>Flooding is the most obvious effect of climate change. Current guidelines used by planners (100 year storm plus climate change) are starting to look increasingly inadequate and will undoubtedly need to be upgraded during the life of the plan. Some recent studies are suggesting that climate change induced flooding could increase by a factor of five by 2050.</p> <p>Flood mitigation requires more than simply not building on areas likely to flood, it involves ensuring that land which will retain water is preserved, flood plains are created and maintained and that land usage – particularly in rural areas – does not generate undue amounts of run off. Water flows do not respect administrative boundaries and it is inevitable that flood mitigation measures will be required within the plan area to reduce flooding problems elsewhere. For example: flood plains installed in the Rural South of the plan area in order to mitigate flooding problems in Stafford.</p> <p>Document comments:</p> <ol style="list-style-type: none"> <li>1. The document does not address the potential need to make changes to land used for agriculture in the longer term to accommodate climate change effects. e.g. run-off from agricultural land.</li> <li>2. Flooding: current standards for 100 year storm plus climate change are looking increasingly inadequate and are likely to be upgraded during the lifetime of this plan.</li> <li>3. Flood plain projects and other flood mitigation measures in the rural area have not been addressed.</li> <li>4. The document does not address the issue that flooding in this area can cause problems for other areas downstream. e.g. Stafford is affected by drainage from parts of the Rural South and there</li> </ol>	Noted. Developments will be required to consider national and local flood risk policy and guidance to ensure that developments are safe while not increasing the risk of flooding elsewhere.

		<p>needs to be co-operation to ensure joined up schemes are implemented e.g. upstream floodplains and restriction of development in areas where it might cause flooding elsewhere. Land which naturally retains water [e.g. meres and mosses areas and woodland] needs to be protected – this is not mentioned in the document.</p> <p>6. The document does not address the role of agriculture in flood mitigation. For example: restricting the growth of high run-off crops such as maize in places where this could contribute to flooding either on site or elsewhere.</p>	
IC027/267	Keele Parish Council	Poor maintenance of the drains leads to flooding at vulnerable spots, even on A roads, and the use of country lanes as rat-runs for commuters, puts a strain on local communities and causes damage to road surfaces.	Comment appears to be directed at the future maintenance of drains; along with commuter routes and damaged caused by such commuters. The maintenance of the road network is outside the scope of the JLP.
IC027/274	Keele Parish Council	<p>There appears to be an increase in the risk of flooding due to climate change and this adds to the importance of maintaining woodland and open ground with hedgerows that can absorb water, and also managing any water that runs off from such areas, often on to roads.</p> <p>It is important that flood risk is considered both in terms of the agricultural economy and development.</p>	Noted.
ICO32/298	United Utilities	<p>United Utilities recommends that the Council includes a policy in the emerging Joint Local Plan on surface water management, and suggest including the following draft policy in the 'Preferred Options' version of the document:</p> <p>"Surface water should be discharged in the following order of priority:</p> <ol style="list-style-type: none"> <li>1. An adequate soakaway or some other form of infiltration system.</li> <li>2. An attenuated discharge to watercourse.</li> <li>3. An attenuated discharge to public surface water sewer.</li> <li>4. An attenuated discharge to public combined sewer.</li> </ol> <p>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider,</p>	Noted. Consideration will be given to surface water management and the requirements of national and local policy, along with non-statutory technical standards for sustainable drainage. In addition, consideration will be had to evidence relating to this topic (SFRA and Water Cycle Study).

		<p>holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction.</p> <p>On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.</p> <p>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.</p> <p>The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency.”</p> <p>New development should manage surface water run-off in a sustainable and appropriate way. Developers should look at ways to incorporate an element of betterment within their proposals. This approach is in accordance with paragraph 103 of the NPPF.</p>	
IC049/390	Woodland Trust	We would like to see this Local Plan reflect the increasingly recognised benefits that trees and woodland can deliver to positive water quality and flow outcomes.	Noted.
IC051/398	Environment Agency	One of the major contributing factors to deterioration in Water Quality and subsequent failure under WFD is inadequate Sewer Capacity. Considering the potential projected increase in housing need during this plan period, we would expect that this is looked at in further detail as part of a Water Cycle Study. There appears to be no mention of Sewerage Infrastructure and it is a vital part of forward planning, particularly in relation to the Infrastructure Delivery Plan that will need to be produced. It is highly likely that sewer upgrades will be needed across the area, and while Severn Trent have a duty to provide upgrades, they are normally only programmed in on a 5 year cycle, meaning that shortfalls in capacity may impede the deliverability of housing numbers if the sewer capacity cannot keep up with growth. However, this is only	Noted. Consideration will be had to evidence relating to this topic (SFRA and Water Cycle Study).



		<p>one aspect of Water Cycle Studies, as the name suggests, it should look at water use and demand as well as storing water on a whole catchment basis to prevent flood risk. Further Guidance on how this should be carried out and what should be included can be found below:</p> <p><a href="http://intranet.ea.gov/static/documents/Policy/9_water_cycle_study_guidance.pdf">http://intranet.ea.gov/static/documents/Policy/9_water_cycle_study_guidance.pdf</a></p>	
IC051/399	Environment Agency	<p>There are unlikely to be any sites identified within the plan that will need non-mains drainage apart from possibly some of the Gypsy and Traveller Sites. We recommend that where feasible, the sites should connect to the mains sewer network, but where this is not possible, it should follow the Planning Practice Guidance Water Supply Wastewater and Water Quality, Paragraph 020, (formerly set out in Circular 03/99), in order to protect surface and groundwater quality as part of WFD. Early consultation with Severn Trent should be encouraged during this process.</p>	<p>The importance of protecting water quality by discharging into the main sewer is noted. Welcome steer towards the guidance that exists regarding developments that are not able to connect to mains sewer network.</p>
IC051/400	Environment Agency	<p>Sustainable Drainage is an important aspect of SFRA's, Water Cycle Studies and Surface Water Management Plans and obviously the main Local Plan as part of Policy. This is due to the range of benefits they provide, whether Economic, in relation to Health and Well-Being or the Natural Environment. Sustainable Drainage systems come in many forms.</p> <p>There is a Hierarchy of preference with some such as ponds and swales providing all benefits including attenuation, water quality improvements, habitat provision as well as visual amenity and economic benefits due to them being much cheaper than underground storage tanks for example. On smaller sites where space is at more of a premium, lower down the Hierarchy might be Permeable Paving for example, providing attenuation and some water quality benefit. Consideration should be given to one form or another on all development larger than a few houses for the reasons highlighted above.</p>	<p>Noted. Consideration will be had to evidence relating to this topic (SFRA and Water Cycle Study).</p>
IC051/401	Environment Agency	<p>Flood risk has been recognised as an important issue in the Energy and Climate Change section. However we question whether it would be more appropriate to include flood risk in the Natural and Rural Environment as the issue and existing level of risk is wider</p>	<p>Flood risk is an issue wider than that resulting purely from climate change and this will be taken into account at future stages in the JLP process.</p>

		than that resulting purely from climate change.	
IC051/403	Environment Agency	The revised SFRA should be used to apply the sequential test and exception test when determining land use allocations. The LPAs should be able to provide robust evidence that a sequential approach to growth and employment had been taken to steer development away from areas at risk of flooding. This should be reflected in local plan policies related to flood risk.	Consideration will be had to evidence relating to this topic (SFRA and Water Cycle Study).
IC051/404	Environment Agency	It is important that any permanent or semi-permanent Gypsy and Traveller sites are not located in flood zone 3a as they are considered highly vulnerable in line with tables 1- 3 Flood Risk and Flood Zone Tables of the Planning Practice Guide.	Noted. Consideration will be had to flood risk policy and guidance as the plan progresses and allocations and policies are developed.
IC051/405	Environment Agency	Consideration should be given to developing policies which would contribute towards providing natural and catchment wide solutions for reducing flood risk now and into the future. Natural flood management measures can help slow, store and filter water. Environmental, social and other benefits (such as reduced soil erosion) can be provided simultaneously with reducing flood risk. Along with making existing flood defences more resilient to climate change, it can help us to achieve Water Framework Directive and Floods Directive and biodiversity goals at the same time. Natural flood management measures typically cost less to implement and maintain than traditional "hard engineered defences.	Noted. The possibility of developing policies with a preference towards natural solutions will be considered later in the plan-making process.
IC052/418	NFU	<p>The document does not include details of the SUDS (Sustainable Urban Drainage) requirements that would apply to new development or how surface water runoff could be captured and managed to reduce flood risk. Therefore the document needs to investigate the wider impacts of water management to ensure that drainage capacity is available to cope with the new demands placed on the county's natural infrastructure.</p> <p>The paper does not examine the additional demands that will be placed upon water abstraction or sewerage treatment capacity in the area. Again these are areas that may impact upon adjacent farm businesses and we would welcome more information on how potential impacts will be mitigated.</p>	The consultation deliberately did not include proposed policies but rather sought to highlight issues. The distribution of growth will be considered at Strategic Options thus it isn't possible to know at this stage what demands will be placed on the natural infrastructure. However, the implications for water abstraction or sewage treatment will be considered once the development needs have been narrowed down and any mitigation measures which are required will be identified in the Infrastructure Delivery Plan. Consideration will be had to evidence required in order to take into account the capacity of existing infrastructure (SFRA and Water Cycle Study).
IC060/438	Richard Oppenheimer	Flood mitigation requires more than simply not building on areas likely to flood, it involves ensuring that land which will retain water	1. The JLP is unable to influence the way in which agricultural land is managed. No action required. 2.

		<p>is preserved, flood plains are created and maintained and that land usage – particularly in rural areas – does not generate undue amounts of run off. Water flows do not respect administrative boundaries and it is inevitable that flood mitigation measures will be required within the plan area to reduce flooding problems elsewhere. For example: flood plains installed in the Rural South of the plan area in order to mitigate flooding problems in Stafford.</p> <p>Document comments:</p> <ol style="list-style-type: none"> <li>1. The document does not address the potential need to make changes to land used for agriculture in the longer term to accommodate climate change effects. e.g. run-off from agricultural land.</li> <li>2. Flooding: current standards for 100 year storm plus climate change are looking increasingly inadequate and are likely to be upgraded during the lifetime of this plan.</li> <li>3. Flood plain projects and other flood mitigation measures in the rural area have not been addressed.</li> <li>4. The document does not address the issue that flooding in this area can cause problems for other areas downstream. e.g. Stafford is affected by drainage from parts of the Rural South and there needs to be co-operation to ensure joined up schemes are implemented e.g. upstream floodplains and restriction of development in areas where it might cause flooding elsewhere.</li> <li>5. Land which naturally retains water [e.g. meres and mosses areas and woodland] needs to be protected – this is not mentioned in the document.</li> <li>6. The document does not address the role of agriculture in flood mitigation. For example: restricting the growth of high run-off crops such as maize in places where this could contribute to flooding either on site or elsewhere</li> </ol>	<p>This will be given consideration as part of the update of the SFRA. 3. This will be given consideration as part of the SFRA update, as set out in the ECC Technical Paper at 6.1 Flood Risk. 4. The risk is noted. This will need to be addressed through 'Duty to cooperate discussions' if Stafford Borough &amp; or the County Council identify this as an issue at the Spatial Options or Draft Plan stages. 5. Reference is made to meres and mosses in Chapter 8 and corresponding technical paper, and it clarifies that these areas are already protected. Future stages of the Local Plan process should give consideration to the potential role meres and mosses can play in mitigating climate change. 6. The Joint Local Plan cannot influence the types of crops that are grown. No action required.</p>
IC080/611	Nicky Davis	We should not build on flood plains.	Comment appears to misunderstand Issue 4. The Issues Consultation document does not propose building in the flood plain. It recognises that National Policy makes provision for development in areas at risk of flood providing sustainability considerations exist and mitigation measures are capable of making the development safe without increasing flood risk elsewhere.

## Issue 5: Contaminated Land

Reference	Consultee Name	Comments	Officer Comments
IC003/6	Stoke-on-Trent Public Protection	Reference is made to "significant areas of contaminated land in Stoke-on-Trent". However, there is only one area within Stoke-on-Trent that has been formally classified as 'contaminated land'.	Whilst it is noted that there is only one formal area classified as 'contaminated land', there are many sites which are brownfield nature which it is anticipated could contain differing levels of contamination.
IC003/10	Stoke-on-Trent Public Protection	In paragraph 9.25 reference is made to "...costly remediation is often required.. when they are contaminated." More appropriate wording would be when contamination is present.	Noted. No specific actions required, but take this phrasing into account when preparing future texts.
IC009/132	Councillor Derek R Davies - NDP Steering Group	It is not clear why contaminated land is considered to be an ECC issue rather than an environmental issue. Document comments: 9.4 – Why is contaminated land relevant to ECC?	Comment repeats ICO 60. Contaminated land is an environmental issue. However, this was the most appropriate chapter within the consultation document to raise this issue.
IC039/347	Mr A P Thompson	It was pleasing to read that only a small % of brownfield sites are contaminated. Developers have no excuse for not using these, in view of this and the fact that climate change is creating major flooding issues, development of prime agricultural greenfield land in this area should be unnecessary. These fields are also needed to grow crops for the increasing population, also the brownfield sites are in the urban areas where the journey to work is easier, avoiding additional traffic congestion.	The content of Issue 5 has been misunderstood. This section clearly states that there are thousands of sites affected by contamination to a greater or lesser degree creating constraints on the supply of land within the urban area. A brownfield site within the urban area might provide good access to services but it may not be viable or potentially not deliverable due to the costs of remediating the site. No action required
IC051/408	Environment Agency	From a contamination and groundwater perspective, we agree with the issues raised and are not aware of any additional issues to add.	Noted.
IC060/440	Richard Oppenheimer	It is not clear why contaminated land is considered to be an ECC issue rather than an environmental issue.	Comment repeats ICO 09. Contaminated land is an environmental issue. However, this was the most appropriate chapter within the consultation document to raise this issue

## Energy and Climate Change Technical Paper

Reference	Consultee Name	Section	Comments	Officer Comments
IC003/12	Stoke-on-Trent Public Protection	Page 7, paragraph 5.2	Only refers to Newcastle. No mention of past trends in Stoke-on-Trent which is a missed opportunity. The results of long term monitoring throughout the city generally show an overall improving trend for air quality in Stoke-on-Trent for all of the monitored pollutants. Stoke-on-Trent complies with all of the air quality objectives except for that in relation to nitrogen dioxide.	Comment is noted and where evidence exists, both areas will be referred to in the future.
IC003/13	Stoke-on-Trent Public Protection	Page 9, paragraph 6.7	Reference is made again to numerous areas known to be failing to meet air quality standards. This needs to be changed to avoid presenting an inaccurate picture.	Noted. Future documentation will need to be more specific and evidenced in terms of the factors influencing air quality that are and are not complied with.
IC003/14	Stoke-on-Trent Public Protection	Page 11, table within section 7	In the weaknesses column, bullet points 2 and 3 give the impression that Newcastle is getting worse. More specific detail about what the Air Quality Management Area relates to, i.e. one pollutant, namely nitrogen dioxide, needs including. At the sixth bullet point, the text refers to parts of Stoke-on-Trent being contaminated, suggesting more than one area. However, there is only one area within Stoke-on-Trent that has been formally classified as 'contaminated land'.	Noted. Future documentation will need to be more specific and evidenced in terms of the factors influencing air quality that are
IC051/402	Environment Agency	Para 6.11	<p>The Energy and Climate Change Technical Paper refers to the fact that both authorities have SFRA's which were published in 2008. In order to ensure that the new joint local plan is based on sound evidence, it will be necessary for these SFRA's to be reviewed and updated. They should take into account new data and information available since the publication of the original assessments including the following:</p> <ul style="list-style-type: none"> <li>· Changes in legislation and national planning guidance since 2008.</li> <li>· Recent modelling work for Fowlea Brook carried out by Stoke City Council.</li> <li>· Hazard mapping for Lyme Brook carried out by the Environment Agency.</li> <li>· The new climate change allowances recently published.</li> <li>· Local Flood Risk Management Strategies produced by Stoke-on-Trent and Staffordshire Lead Local Flood Authorities.</li> <li>· Fowlea Brook has been classified as a rapid response catchment.</li> </ul>	Comments Noted. Consideration will be had to evidence relating to this topic (SFRA and Water Cycle Study).

		<p><b>New Climate Change Guidance</b></p> <ul style="list-style-type: none"> <li>• In February of this year, new climate change guidance was produced to reflect the increasing impact predicted in UKCIP09. This has increased the percentages that will need to be applied when modelling watercourses.</li> <li>• We have updated our guidance on how climate change could affect flood risk to new development - 'Flood risk assessments: climate change allowances'</li> <li>• It has been finalised in the last few months following user testing with practitioners in 2015.</li> <li>• It has been updated in line with best available scientific evidence to help ensure new housing and other developments remain safe and resilient to flooding, without increasing flood risk elsewhere.</li> </ul> <p>What are the changes?</p> <p>The update is based new scientific evidence. The main changes are to the peak river flow allowances:</p> <ul style="list-style-type: none"> <li>• They are provided for each river basin district rather than a single national allowance.</li> <li>• A range of allowances are provided based on different probabilities for each epoch, rather than a single allowance for each epoch.</li> <li>• The allowances for the upper end of the range are significantly higher than previous single national allowance.</li> </ul> <p>There is also a small change to peak rainfall allowances. Rather than a single allowance, a range of allowances is provided. The allowance at the upper end of the range is slightly higher than the current single allowance. As previously, the allowances are provided at a national scale.</p> <p>In updating the SFRA, it is likely that strategic sites near watercourses will need to be remodelled using the new climate change increases. This can be looked in further detail at the next stage once the Local Authority has a clearer idea of locations. Some of the more minor watercourses that may not have detailed modelling associated with them in the first instance will also need to be modelled if it is likely to be impacted upon by new development.</p>	
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## Glossary

Glossary				
Reference	Consultee Name	Section	Comments	Officer Comments
ICO42/363	Highways England		The Glossary of terms within section 11 could helpfully include definitions of the Strategic Road Network and the Local Road Network and to distinguish between the differing areas of responsibility held by Staffordshire CC and Highways England	